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FINAL ADDENDUM
TO THE DRAFT EIR

**STATE OF CALIFORNIA
SAN FRANCISCO
CIVIC CENTER COMPLEX
Environmental Impact Report**

SCH No. 94011008

April 21, 1995

Prepared for:
San Francisco State Building Authority
and
State of California
Department of General Services
Office of Project Development and Management
400 R Street, Suite 5100
Sacramento, California 95814

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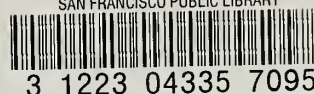
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DEPARTMENT OF GENERAL SERVICES

OFFICE OF PROJECT DEVELOPMENT AND MANAGEMENT

400 R STREET, SUITE 5100

SACRAMENTO, CA 95814



DATE: April 21, 1995

TO: Reviewing Agencies, Organizations and Individuals

SUBJECT: Public Meeting on Certification of Final Environmental Impact Report,
and Consideration of Project Approval of and Environmental Findings on
the STATE OF CALIFORNIA SAN FRANCISCO CIVIC CENTER
COMPLEX

CO-LEAD AGENCIES: San Francisco State Building Authority
770 Golden Gate Avenue
San Francisco, CA 94102

California Department of General Services
400 R Street, Suite 5100
Sacramento, CA 95814

The San Francisco State Building Authority and the California Department of General Services, as co-lead agencies on the above-mentioned project, will hold a public meeting to consider the following actions in relation to the State of California San Francisco Civic Center Complex:

Certification of the Environmental Impact Report (EIR)
Adoption of Environmental Findings
Approval of the Project

The meeting will be held May 4 at 2:00 p.m. in the Commission Board Room of the San Francisco Redevelopment Agency, 770 Golden Gate Avenue - Third Floor, San Francisco. At this meeting the Authority and the Department may certify the EIR and approve the project, or may continue certification of the EIR and/or consideration of project approval to a date certain. Also at this meeting the Authority and the Department will entertain comments regarding the project and project approval. Because the comment period on the EIR closed in December, the Authority cannot respond to late comments on the adequacy of the EIR during the meeting. If you are unable to attend the meeting and wish information regarding the results of the meeting, or if you would like a copy of the Final EIR, please contact Christal Waters at (916) 324-0206.

Copies of the Draft EIR and the Final Addendum to the Draft EIR are available at:

San Francisco Public Library
Main Library
Civic Center
San Francisco, CA 94102

Clerk of the Board of Supervisors
City and County of San Francisco
Veterans Building
401 Van Ness Avenue, Room 308
San Francisco, CA 94102

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Sacramento, California 95814

**Environmental
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**STATE OF CALIFORNIA
SAN FRANCISCO CIVIC CENTER COMPLEX
FINAL ENVIRONMENTAL IMPACT REPORT ADDENDUM**

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I. INTRODUCTION

A. CEQA PROCESS

On November 7, 1994, the San Francisco State Building Authority and California Department of General Services (Co-Lead Agencies) released for public review a Draft Environmental Impact Report (Draft EIR or DEIR) on the proposed State of California San Francisco Civic Center Complex (SCH No. 94011008). The required 45-day public review and comment period on the DEIR began on November 7, 1994 and closed on December 21, 1994. The co-lead agencies held a public hearing on the Draft EIR on December 6, 1994.

The Draft EIR for the State of California San Francisco Civic Center Complex, together with this Final EIR Addendum, constitute the Final EIR for the proposed project. The Final EIR is an information document prepared by the Co-Lead Agencies that must be considered by the agencies before approving or denying the proposed project. California Environmental Quality Act (CEQA) *Guidelines* (Section 15132) specify the following:

"The Final EIR shall consist of:

- (a) The Draft EIR or a revision of the draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency."

This document has been prepared pursuant to CEQA Guidelines. This Final EIR Addendum incorporates comments from public agencies and the general public, and contains appropriate responses by the Lead Agency to those comments.

B. METHOD OF ORGANIZATION

This Final EIR Addendum for the proposed State of California Civic Center Complex contains information in response to concerns raised during the public comment period.

This introductory Chapter I also contains a list of all persons and organizations who submitted written comments on the Draft EIR and/or who testified at the public hearing held on December 6, 1994. The Table of Contents lists persons or organizations submitting written comments individually. Chapter II of this document contains text changes to the Draft EIR, reflecting necessary additions and corrections addressed by the public comments or responses to comments, or initiated by Department of General Services, Office of Project Development and Management (OPDM) staff to correct the Draft EIR text. Chapter II begins with a supplemental analysis of Alternative 2, which would consist of a smaller New State Office Building and the renovation and reuse of 525 Golden Gate Avenue. This supplemental analysis is presented as a master response to comments received on the Draft EIR in connection with this alternative. Text changes, beginning on p. 13 of this document, appear in order of page number in the Draft EIR on which the change is made. Where a text change is made as part of a response to a public comment, the comment number is noted. Revised and additional figures, including additional visual simulations of the proposed project and simulations of Alternative 2, follow the text changes, and appear at the end of Chapter II, beginning on p. 26.

Chapter III contains copies of written comments received during the public comment period and responses to those comments. Each letter of comment is designated alphabetically; each comment is numbered in the margin of the comment letter, and the responses to all of the comments in a particular letter follow that letter. In some cases, the response refers to another response to a similar comment; the comments are referenced alphanumerically by letter and comment number, as in "the response to Comment A-2" (meaning the response to the second comment in letter A). Where a response includes a change to the text of the Draft EIR, a reference is made to Chapter II, where text changes, beginning on p. 13 of this document, are listed in order of page number in the Draft EIR.

Chapter IV similarly includes the public comment portion of the transcript of the December 6, 1994, public hearing on the Draft EIR, along with responses to these comments. As with the written comments, each individual's hearing comments are designated alphabetically; each comment is numbered in the margin of the hearing transcript, and the responses to all of the

comments made by a particular commenter follow that commenter's entry in the transcript. As with the responses to written comments, if a response refers to another response an alphanumeric reference is provided, as in "the response to Comment AA-2" (meaning the response to the second comment in Hearing Comments AA). Where a response includes a change to the text of the Draft EIR, a reference is made to Chapter II, where text changes, beginning on p. 13 of this document, are listed in order of page number in the Draft EIR.

C. LIST OF PERSONS COMMENTING ON THE DRAFT EIR

1. PERSONS AND ORGANIZATIONS COMMENTING IN WRITING

The following agencies, organizations, and individuals submitted written comments on the Draft EIR during the EIR review period (November 7 - December 21, 1994).

Michael Chiriatti, Jr., Chief, State Clearinghouse, Governor's Office of Planning
and Research
Jason Marshall, Environmental Analyst, California Department of Conservation
Cherilyn Widell, State Historic Preservation Officer, Office of Historic Preservation,
Department of Parks and Recreation
Robert E. Mackensen, AIA, Executive Director, State Historical Building Safety Board
David W. Look, Chief, Preservation Assistance Branch, Division of National Register
Programs, National Park Service (Western Region), U.S. Department of the Interior
Lucian R. Blazej, Director of Planning, San Francisco Planning Department
Barbara W. Sahm, Environmental Review Officer, San Francisco Planning Department
Carol Roos, EIR Coordinator, San Francisco Planning Department
James D. Lowé, Transit Planner, San Francisco Municipal Railway
Vincent Marsh, Secretary to the San Francisco Landmarks Preservation Advisory Board
Jerry Robbins, Transportation Planner, San Francisco Department of Parking and Traffic
Deborah Learner, Park Planner, and Marvin Yee, Assistant Landscape Architect,
San Francisco Recreation and Park Department
Susana Montaña, Project Manager, Civic Center Study, San Francisco Planning
Department
Debra Lehane, Civic Design Review Coordinator, San Francisco Art Commission
Yvonne Gibson, Associate Transportation Planner, San Francisco Planning Department
Edward N. Michael
Alice Wadlington, President, North of Market Planning Coalition

2. PERSONS AND ORGANIZATIONS COMMENTING AT THE PUBLIC HEARING

The following persons provided DEIR comments at the Public Hearing on the Draft EIR, at 505 Van Ness Avenue on Tuesday, December 6, 1994.

Rob Rich, North of Market Planning Coalition
Ed Michael
Marvis Phillips, North of Market Planning Coalition
Bill Jones
Alice Wadlington, President, North of Market Planning Coalition
Terry Hogan, North of Market Planning Coalition
Mary Anne Miller, San Francisco Tomorrow
Brad Paul, Bay Area Women's Resource Center
Kelly Cullen
Michael Levin
Kathy Berger, Executive Director, North of Market Planning Coalition

II. REVISIONS / CORRECTIONS TO THE DRAFT EIR

A. SUPPLEMENTAL ANALYSIS OF ALTERNATIVE 2 (525 Golden Gate Avenue)

INTRODUCTION

Many of the comments on the Draft EIR requested further consideration of Alternative 2, which would consist of a smaller New State Office Building than the proposed project, along with the renovation and reuse of 525 Golden Gate Avenue. In response to the comments, the Department of General Services has re-examined this alternative in greater detail, looking at legal, program, design and fiscal implications. The information developed in that re-examination is provided here. The conclusion is that reuse of 525 Golden Gate Avenue (with either Alternative 2 or Alternative 3) is programatically awkward, inconsistent with the statute authorizing the project, and financially infeasible due to the substantially greater costs of construction and maintenance, compared to the proposed project.

The re-analysis of Alternative 2 included definition of design differences that would be achieved at the New State Office Building through reduction of massing, development of a more refined cost savings estimate for the space reduction in the new building, review and update to 1995 dollars of the previous estimate for rehabilitation of 525 Golden Gate Avenue, and review of the operations and maintenance cost differential for this alternative. Following the discussion of cost issues, this analysis also examines in more detail program and legal issues that would affect the feasibility of including 525 Golden Gate Avenue as part of the project through adoption of Alternative 2 (or Alternative 3, which also would occupy 525 Golden Gate Avenue).

DESIGN DEFINITION OF 455 GOLDEN GATE BUILDING MASS REDUCTION

In the description of Alternative 2 in the Draft EIR, it was assumed that the proposed New State Office Building would be reduced in size by approximately 120,000 net (usable) square feet (nsf), the amount of space that would be available at 525 Golden Gate Avenue. It was accordingly assumed for purposes of analysis that the new building would be reduced in height by three stories, although no specific plan was developed for the re-design of the structure. In refining the analysis of Alternative 2, the first step was to refine the assumptions. For this analysis, it was assumed that the proposed New State Office Building would be reduced in size

by 124,000 nsf. For design definition of the new building under this alternative and for use in more closely estimating the costs involved, the Department of General Services directed the design-build team, HSH Design-Build, Inc., to determine how to reduce the mass of the New State Office Building by 124,000 nsf "in such a manner as to maximize reductions in height and mass of the building envelope as well as maximizing the overall cost reduction," and to develop a more refined estimate of the cost savings in construction of the new building that could be achieved by this reduction in size.

For the reduction in size, the design-build team identified the following strategy to most effectively reduce the bulk and height of the new State Office Building at 455 Golden Gate Avenue:

1. Remove levels 9 and 10 (reduction of 92,000 nsf);
2. Remove level 16 (reduction of 13,800 nsf) while maintaining the original elevator concept; and
3. Remove the remaining approximately 18,000 nsf through articulation of the Golden Gate Avenue facade.

This would reduce the height of the building by three stories, as was assumed in the Draft EIR, and would allow flexibility to address community concerns regarding north facade massing. The reduced-size new building, as described in this analysis, is similar to the new building included in the Draft EIR analysis of Alternative 2, pp. 220-225, and would not result in any new or more severe effects, compared to those described in the Draft EIR.

It should also be noted that the design-build team has proposed some refinements to the facades on Golden Gate Avenue and Polk and Larkin Streets that could be incorporated into the project as proposed. These or similar refinements would be made if, in the opinion of the San Francisco State Building Authority or Authority Staff, as appropriate, they prove beneficial and feasible during design development. Please see the response to Comment F-2, p. 74 of this document.

The reduced-scale New State Office Building developed for this analysis is shown in visual simulations in Figures R-3 through R-7, pp. 29-33.

FEASIBILITY ANALYSIS OF ALTERNATIVE 2

Cost Comparison

The revised cost analysis determined that the construction cost for Alternative 2, including the cost of rehabilitating 525 Golden Gate Avenue and including a cost reduction for the reduced size of the new building, would be approximately \$217 million, or about \$17 million more than the proposed project and nearly \$16 million more than the Draft EIR assumed for the cost of Alternative 2. Slightly more than half of the \$16 million is a result of lower projected savings in construction costs for reduced size of the new building, while the remainder reflects an increase in the estimate to rehabilitate 525 Golden Gate Avenue. Each of these topics is discussed in more detail below. The revised cost analysis also determined that the annual operations and maintenance (O&M) cost for Alternative 2, including the proposed New State Office Building, 525 Golden Gate Avenue and the historic California State Building (350 McAllister Street), deducting for existing O&M costs at 525 Golden Gate, would be about \$7.3 million, or about \$350,000 more than for the proposed project. This amount is about \$100,000 less than the Draft EIR estimated for Alternative 2. This estimate is also discussed in more detail below. Over the 25-year bond payback period, the revised analysis shows that Alternative 2 would have a total cost (principal, interest and O&M costs) of about \$796 million, compared to about \$741 million¹ for the proposed project (and about \$770 million for Alternative 2 as estimated in the Draft EIR, p. 222.) Measured in constant 1998 dollars, the present value (at project occupancy in 1998) cost of Alternative 2 would be approximately \$369 million, compared to approximately \$344 million for the proposed project, a difference of about \$25 million.

A summary of the costs of Alternative 2 compared with those of the proposed project, as restudied, is provided in Table R-1. Assumptions concerning bond interest rates and the rate of inflation were held constant from the analysis prepared by the Department of General Services for use in the Draft EIR.

¹ In the course of preparing the revised cost analysis, the proposed project's payback cost was also revised, to about \$741 million, compared to the estimate of about \$748 million, which was presented in the Draft EIR on p. 222.

TABLE R-1: COST COMPARISON, PROPOSED PROJECT AND ALTERNATIVE 2

	Proposed Project (A)	Alternative 2 (Revised) (B)	Alternative 2 (Draft EIR) (C)	Alternative 2 Variance (B-C)	Alternative 2 (Revised) Less Project (B-A)
Project Cost	\$200,000,000	\$200,000,000	\$200,000,000	---	---
Allowance for reduced size of New State Office Building	---	(11,800,000)	(20,400,000)	8,600,000	(11,800,000)
Additional cost for rehabilitation of 525 Golden Gate	---	28,800,000	21,600,000	7,200,000	28,800,000
Total Construction Cost	\$200,000,000	\$217,000,000	\$201,200,000	\$15,800,000	\$17,000,000
Project O&M Cost	\$6,930,000	\$6,930,000	\$6,930,000		
Additional O&M, 525 Golden Gate	---	460,000	460,000	-0-	460,000
Existing O&M, 525 Golden Gate	---	(109,000)		(109,000)	(109,000)
Total Annual O&M	\$6,930,000	\$7,281,000	\$7,390,000	(\$109,000)	\$351,000
25-Year Payback Cost	\$741,000,000	\$796,000,000	\$770,000,000	\$26,000,000	\$55,000,000
Present Value	\$344,000,000	\$369,000,000	n/a	n/a	\$25,000,000

SOURCE: Department of General Services, Office of Project Development and Management

Construction Costs

455 Golden Gate Cost - Savings From Space Reduction: The cost savings from the reduction in space in the proposed New State Office Building, compared to the new building with the project as proposed, would be approximately \$11,800,000. This estimate was developed by the design-build team and reviewed by the Department of General Services. The cost savings was based on

the estimated savings for specific building elements, including the building superstructure, building exterior and interior, plumbing, fire protection, heating/ventilation/air conditioning (HVAC), electrical and tenant improvement work. The state's cost estimate for this alternative in the Draft EIR assumed that the reduction would save \$20,400,000, or \$8.6 million greater than the design-build team's estimate. The original estimate was developed prior to the selection of the design-build team and was based on general assumptions that the cost savings from the space reduction would be 80 percent of the cost of new space, and that new space would cost \$170 per gross square foot. The specifics of the project did not validate these assumptions.

Rehabilitation of 525 Golden Gate Avenue: The reuse of the existing building at 525 Golden Gate Avenue was reviewed for project feasibility, as well as cost. The cost analysis prepared for the Draft EIR used the least costly estimates and project descriptions that were contained in a report on re-use of the 525 Golden Gate Avenue building, prepared as part of the *San Francisco/Oakland State Facilities Plan*, published by the Department of General Services in 1992. In that report the least costly renovation of this building was limited to seismic retrofit, minimal asbestos abatement consistent with seismic retrofit, and bringing the building up to code. No tenant improvements, no separate HVAC plant, no changes to the building exterior and no improvements to building program efficiencies or operating systems were included. This minimal rehabilitation would not be consistent with the type of space and facility necessary for obtaining long-term financing. If the state were to select Alternative 2, it would undertake a more realistic - and more costly - rehabilitation project that would meet program and financing requirements.

To meet these requirements, the 525 Golden Gate Avenue building would undergo seismic retrofit and full hazardous materials abatement and would be renovated for long-term occupancy (20+ years), brought up to code, provided with tenant improvements, and programmed for office space that would be similar to the New State Office Building's office space. Included in this rehabilitation would be: soils stabilization for seismic retrofit; seismic bracing systems; asbestos removal and interior demolition work preparatory to the removal of asbestos; rehabilitation of the floors and roof structures, and replacement of roofing material; replacement of the exterior cladding for maximizing energy efficiency; installation of new HVAC systems; replacement of partitions, core finishes, plumbing, and sprinklers; and associated tenant improvements.

The renovation of 525 Golden Gate would cost approximately \$28.8 million, or about \$7.2 million more than the estimate used in the Draft EIR. As indicated above, total construction

costs for Alternative 2 would be about \$217 million, compared to about \$200 million for the proposed project and compared to about \$201 million assumed in the Draft EIR.

Operations and Maintenance Costs

Operations and Maintenance (O&M) costs of Alternative 2 would consist of the annual costs of the proposed project, plus additional O&M costs that would be incurred with a second stand-alone building (525 Golden Gate), minus the current O&M costs of operating the 525 Golden Gate Avenue building for use only by the Division of Telecommunications, for the Calnet telephone switch. The base O&M costs are on a per-gross-square-foot basis, which would not change. Additional O&M expense would be in addition to base O&M costs. Project O&M costs are estimated at \$6.60 per gross square foot, the same as was used in the analysis prepared for the Draft EIR.

Operation and Maintenance of 525 Golden Gate Avenue, as Part of Alternative 2: Alternative 2 would incur costs to maintain the 525 Golden Gate Avenue building that would be in addition to the costs of the project contained on the 455 Golden Gate Avenue / 350 McAllister Street block. These costs would include additional maintenance for building systems in addition to normal usage at 455 Golden Gate / 350 McAllister, such as maintaining the elevators, the HVAC, and the sprinkler, electrical, domestic water, building security, grounds and entry areas, and window cleaning. Additional janitorial equipment and supplies, and additional staffing in the form of stationary engineers, janitors and a building manager would also be required. Reduction of space in the New State Office Building would not see a proportional reduction in O&M costs for that site, as many of the expenses are based on whole-building costs. The Office of Buildings and Grounds staff estimated the additional O&M cost at \$460,000 per year.

Cost of Maintaining 525 Golden Gate in its Current Condition with the Project as Proposed:

The 1994 total cost of maintaining that building in 1994 was \$109,000. This would be a "credit" against the O&M costs of Alternative 2. Applying these costs as a credit against Alternative 2 is a conservative assumption; if the Calnet telephone switch were to be relocated and the building no longer needed by the Division of Telecommunications, these O&M expenses would no longer be incurred. (See additional discussion of the Calnet switch below.)

Net O&M Costs, Alternative 2: The net additional annual O&M cost of Alternative 2 would be \$460,000 minus \$109,000, or \$351,000.

Program Issues

One of the objectives of the project is to consolidate state office space in the Civic Center (see Draft EIR p. 3); fulfilling this objective would allow state offices to operate in the most efficient manner. While there are a number of local offices with smaller space needs that could be programmed for the 525 Golden Gate Avenue state office building, (*i.e.*, the Franchise Tax Board and Board of Equalization), the programming of smaller buildings is by definition more problematic, as there is less flexibility in space planning, resulting over time in more moves and agency relocations. In addition, to avoid fragmenting the larger agencies, the space in smaller buildings is more appropriate for smaller offices that have more public contacts. The floor plan of 525 Golden Gate Avenue, with the elevators at the end of the building, rather than in the center, provides less efficient office use by creating an increased network of corridors necessary to accommodate small agencies that require more public contact. Such inefficiencies would prove to be more costly.

Legal Issues

As described in the Draft EIR on p. 1, the San Francisco State Building Authority has legislative authority under Chapter 429, Statutes of 1993 (AB 896), to redevelop the 350 McAllister Street / 455 Golden Gate Avenue block and to sell or exchange property at 525 Golden Gate Avenue. The legislation authorizing the project did not identify the 525 Golden Gate Avenue site for redevelopment. The Department would have to obtain that authority before proceeding with Alternative 2. While it is theoretically possible to obtain statutory authority to use the 525 Golden Gate site, the Legislature and the Governor would also consider the cost differential between the proposed project and this alternative. The time needed to obtain this authority would add to the project cost. This cost has not been added into the project economic analysis discussed above.

Status of Calnet Telephone Switch

The Calnet switch in the basement of the 525 Golden Gate building is the Centrex for state offices in the Civic Center. In addition, it acts as the "backbone" connecting the Bay Area state offices with other Calnet phones statewide, carrying voice and data. It was installed in 1990. The Division of Telecommunications estimates that replacement costs are in the neighborhood of \$12 million - \$13 million. Space would be provided in the proposed project to accommodate the

Calnet switch in the event that relocation becomes desirable. The Division of Telecommunications has no plans at this time to relocate the equipment.

Existing Condition of 525 Golden Gate Avenue

The 1989 Loma Prieta earthquake caused cracks in the building facade and interior that require repair, and the building needs to be brought up to current code (Title 24 of the California Code of Regulations). There is friable asbestos in the plenum area between floors.

The Department of General Services does not believe that the 525 Golden Gate Avenue property is not usable or valuable. Should the building eventually be demolished, the property itself has some inherent positive value, that at least partially offsets the cost of asbestos removal and demolition. In the mid-term (five-to ten-year) planning period, it is conceivable that this property may be offered for sale.

The Calnet switch in the basement of 525 Golden Gate Avenue will eventually be replaced by new technology, or might be relocated, once it were amortized, about 1999. Space is being reserved within the proposed project for relocation of the switch, should that be considered appropriate by the Division of Telecommunications at the time of project occupancy.

Commenters have suggested that the cost of relocating the Calnet switch should be considered in the cost comparisons between the proposed project and Alternative 2. The comments have suggested that, to reuse or sell the 525 Golden Gate Avenue site, the state would have to relocate the switch. As indicated above, technological changes or other considerations might render the switch irrelevant in the mid-term future. Further, the Department of General Services believes that it is feasible to protect the switch in the basement of 525 Golden Gate Avenue and redevelop the surface of the site. Even under the assumption that the 525 Golden Gate site must be fully cleared to be marketable, the cost of site clearance (including relocation of the Calnet switch) less the sale value of the property itself, would have to exceed \$17 million (the difference between the project construction cost and the construction cost of Alternative 2) for Alternative 2 to be more cost-effective than the proposed project. While the Department of General Services does not wish to speculate on the value of surplus property, the Department's analysis of the cost of building demolition and potential land sale proceeds does not exceed this value.

B. CORRECTIONS AND TEXT CHANGES

The following corrections and changes are made to the Draft EIR and are incorporated as part of the Final EIR. Revised or new language is underlined (except where all of the text is an addition). Brackets ([]) indicate where text has been deleted.

Where a change is made as part of a response to a comment on the Draft EIR, the comment number is noted in brackets at the end of the text change. Where no comment number is given, the change is initiated by Office of Project Development and Management staff.

Page S-3, the following is added at the end of the second full paragraph:

The canopy, which would be translucent to allow light to pass through, would extend over the sidewalk and a portion of the curb lane of Golden Gate Avenue, but would not conflict with vehicle traffic because it would be about three stories above the street. [P-2]

Page S-5, the last sentence of the first full paragraph is deleted to reflect the fact that construction of the New Main Library has obscured the view of the California State Building from the Market, Hyde, Grove, and Eighth Streets intersection. [P-3]

Page S-6, the following is added as new text following the second sentence of the first paragraph under "Solar Access and Shading":

At noon in March and September, the project would add shade to about 75 percent of the plaza; about 15 percent is already shaded at that time. At noon in December, the project would add shade to about 20 percent of the plaza, which is already about 80 percent shaded, generally completing shading at that time. [G-2]

Page S-6, the third sentence of the second paragraph under "Solar Access and Shading" is revised as follows:

The project would add shade to approximately a 750-sq.-ft. area of United Nations Plaza (not subject to Section 295) for about 15 minutes, about one hour before sunset in June and July. [M-5]

Page S-7, the word "proposed" is deleted from the fifth line of the last paragraph to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District. [J-1]

Page S-8, the second sentence of the fourth paragraph is revised as follows:

The measures include the photo-documentation of the historic resources to be affected; design of the work program as to avoid damage to existing historic resources; use of the State Historical Building Code, as appropriate; and monitoring of renovation and construction work to prevent damage and to avoid disturbance or loss of sub-surface archaeological features. [D-1]

Page S-9, the second sentence of the second paragraph is revised as follows:

The project would generate about approximately 400 net new p.m. peak-hour transit trips, with MUNI and BART receiving approximately 210 and 135 new riders, respectively []. [I-2]

Page S-9, the fourth sentence of the third paragraph is revised as follows:

Net new project parking demand would total about 615 parking spaces, including about 490 long-term spaces[] and about 125 short-term [] spaces. [K-1]

Page S-14, the word "proposed" is deleted from the ninth line of the last paragraph to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District. [J-1]

Page S-24, Impact C.2 was not included in Table I-1 due to an editing error. A revised Impact C.2 is added as follows:

The project would not add shade to public open space [] under the jurisdiction of the [] San Francisco Recreation and Park Commission. [G-4]

Page S-26, Mitigation E.3.a. is revised as follows:

The project would use the provisions for historic buildings in the Americans with Disabilities Act (ADA) and State Historical Building Code, as appropriate. These codes would also be used by the SHPO in their project review. [D-1]

Page 20 (Figure 14), the upper graphic should be labeled, "Typical Low Rise Plan Levels 12-14," not "Levels 7-11." [P-1]

Page 22, the following is added at the end of the second full paragraph:

The canopy would be approximately three stories above street level, allowing for the placement of street trees below, and would extend over the sidewalk and about 10 feet of the curb lane of Golden Gate Avenue. Its height would not conflict with vehicle traffic. The canopy would be constructed of transparent and translucent glass and metal, permitting sunlight to pass through to the sidewalk, and would include lighting at night.
[P-2]

Page 32, the second-to-last sentence is revised to update the information as follows:

[] Funding of seismic work at the existing Main Library building [] was approved by San Francisco voters in November 1994 in preparation for occupation of that building by the Asian Art [] Museum. [G-19]

Page 35, the following policies are added to the discussion of the Urban Design Element of the San Francisco Master Plan:

Objective 2, Policy 5, "use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings"; Objective 3, Policy 6, "relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction"; Objective 3, Policy 7, "recognize the special urban design problems posed in development of large properties"; and Objective 4, Policy 8, "provide convenient access to a variety of recreation opportunities."
[M-9, M-10, M-11]

Page 36, the second sentence of the last paragraph is revised as follows to account for publication of the "Draft for Citizen Review" of the San Francisco Planning Department's *Civic Center Study*:

That plan is under review and in October 1994 the San Francisco Planning Department [] published the *Civic Center Study* - [] Draft for [] Citizen Review.⁵ [M-12]

Page 37, the first sentence of the last paragraph is corrected as follows:

Objective 3 of the draft plan, for Urban Design, states: "Preserve and enhance the design of buildings and their spatial relationship[] within the Civic Center"; Policy 1 for that objective is "maintain the formal architectural character [] of the Civic Center with City Hall as the prominent centerpiece." [E-2, M-14]

Page 38, the following is added as a new paragraph following the first partial paragraph:

In addition to the above Urban Design policies, Policy 8 of Objective 1 states, "Encourage visual interest for pedestrians and pedestrian-interactive ground floor uses within existing historic buildings and in new buildings within the core area. In adaptive reuse of historic buildings, encourage the location of pedestrian-active uses on the ground floor, such as food service spaces, permit filing or records centers, government bookstores or other high volume activities. New buildings should be designed to promote pedestrian safety, interest and comfort." [F-2]

Page 40, the following is added at the end of the second full paragraph:

The net new office space provided by the New State Office Building would, however, be counted against the maximum annual limit of office development in San Francisco, pursuant to City Planning Code Sec. 321(a)(2)(C). [G-1]

Page 42, the first paragraph under Impact A.3 is revised as follows:

The project would generally respond to *City of San Francisco Master Plan* policies, including the Community Facilities, Recreation and Open Space, Transportation, Urban Design, Environmental Protection, and Community Safety Elements, and the Civic Center Area Plans of the *San Francisco Master Plan*: [G-21]

Page 42, the third sentence of the second bulleted paragraph under Impact A.3 is revised as follows:

The project would add new shade to the Phillip Burton Federal Building plaza and United Nations Plaza; [] those open spaces [] are not under the jurisdiction of the [] San Francisco Recreation and Park Commission (see Section C., Solar Access and Shading). [G-5]

Page 43, the second full bulleted paragraph is revised as follows:

In relation to the revised Civic Center Plan now under public review, the project would continue and expand public and governmental uses in the Civic Center, and would maintain the architectural and urban design character of the California State Building as part of the Beaux-Arts Civic Center. The New State Office Building, at 209 ft., would be greater in height than existing buildings in the Civic Center core (see Section B., Visual and Design Factors), and the project would have shadow and wind effects on open spaces (see Section C., Solar Access and Shading, and Section D., Wind). The New State Office Building would include a grand main entrance that would be adequately lighted and partially protected from winds by the proposed canopy on Golden Gate Avenue. [F-2]

Page 44, Endnote 5 is revised as follows to account for publication of the "Draft for Citizen Review" of the San Francisco Planning Department's *Civic Center Study*:

San Francisco Planning Department [], *Civic Center Study - Comprehensive Plan and Development Progress for: Civic Center, Market Street Cultural Corridor, Mid Market Street; South Van Ness; Hayes Valley and North of Market Area of the City, [] Draft for [] Citizen Review, [] October 1994. [M-12]*

Pages 58 and 59, the titles of Figures 25 and 26 are reversed. Figure 25 is "View of Site Looking West from Golden Gate Avenue Near Larkin Street." Figure 26 is "Photomontage: View of Site Looking West from Golden Gate Avenue Near Larkin Street." [JJ-2]

Page 67, Impact C.2 is revised as follows:

The project would not add shade to public open space [] under the jurisdiction of the [] San Francisco Recreation and Park Commission. (Not Significant) [G-4]

Page 80, the word "proposed" is deleted from the last line of the first paragraph and from the third and fifth lines of the second paragraph to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District. [J-1]

Page 81, Figure 31 is revised to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District, and to correct minor inaccuracies. The revised Figure 31 appears on p. 26 of this document. [J-1, J-2, J-4, J-5]

Page 83, the second full sentence of the first partial paragraph is revised as follows to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District:

Additionally, the City of San Francisco [] has adopted a local Civic Center Historic District with more extensive boundaries, including the Annex (see Figure 31). [J-9]

Page 83, the second and third full paragraphs are revised as follows to make minor changes in wording and to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District:

The [] local Civic Center Historic District, like other San Francisco historic districts, [] includes controls on demolition and alteration of structures on an area basis, rather than building-by-building as is the case with individual City Landmarks. Previously designated individual City Landmarks within the district's boundaries [] remain as such [] with the adoption of the local historic district[]. Any alteration or demolition of contributory and/or

contributory-altered structures within local historic districts would be reviewed by the San Francisco Landmarks Preservation Advisory Board for a Certificate of Appropriateness. However, since the project site is state property, it would not be formally subject to local ordinances and review procedures.

The Civic Center is designated as both a National Historic Landmark District and a Historic District on the National Register of Historic Places, and is listed on the California Register of Historic Resources by virtue of its listing on the National Register. These federal designations offer recognition that certain properties in the district are worthy of preservation and ☐ control alterations to federally-funded projects. The National Historic Landmark District designation entails a somewhat higher degree of review. Neither designation imposes conditions on alterations or demolition for non-federally funded projects, as ☐ does the locally designated historic district. The proposed project would not include use of Federal funds for construction. Therefore, Section 106 of the National Historic Preservation Act of 1966, as amended, ☐ does not apply. [J-1, J-10, J-11]

Page 84, the following is added as a new paragraph immediately before the heading "History of the Civic Center."

In addition, state agencies are directed by statute to use the State Historical Building Code (SHBC) for projects involving historic structures. The SHBC allows for some latitude in retrofitting of historic structures to minimize effects on historic resources. [D-1]

Page 84, the phrase "on the site of an originally proposed Opera House" is deleted from the second-to-last line. [J-12]

Page 85, the second and third paragraphs and the fourth paragraph, continuing to p. 86, are revised as follows to make minor changes in wording and to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District:

Each of the nine buildings above is ☐ designated contributory in the National Register Historic District and National Historic Landmark District and has been rated as such in the ☐ local San Francisco Civic Center Historic District. Other architecturally important buildings in the ☐ local Civic Center Historic District are the San Francisco Unified School District Headquarters (former High School of Commerce) at 135 Van Ness Avenue ☐ and 170 Fell Street (City Landmark No. 140), the Methodist Book Concern at 83 McAllister Street (Downtown Plan Category I), and various interior spaces of some key Civic Center buildings. Newer buildings in the ☐ local historic district include the Governor Edmund G. Brown State Office Building (1986) at Van Ness and McAllister Street and Davies Symphony Hall (1980) at Van Ness Avenue and Grove Street. These recent public buildings in the vicinity and the new public library under construction, are considered contextually responsive to the contributory Civic Center buildings.

Visually, [] most contributors to the Historic Districts use a Neo-Classical vocabulary (except the Spanish Colonial Revival school district headquarters), are faced with stone or terra-cotta to simulate stone, and are Beaux Arts interpretations of the Italian Renaissance style. City Hall is intentionally the most prominent structure: its dome tops off at 300 ft., considerably above the building's 80-ft.-high wings. The other Beaux Arts buildings in the complex maintain the 80-ft.-high standard to complement and enhance City Hall as the district's prominent structure. The California State Building, discussed below, is consistent with this height and vocabulary.

The Annex (1957), at 455 Golden Gate Avenue, is on the northern half of the project site, and is part of a grouping of non-contributory Civic Center structures from the late 1950s. Those include the State Office Building (1959) at 525 Golden Gate Avenue and the 20-story-tall Phillip Burton Federal Office Building (1959) at 450 Golden Gate Avenue. These buildings, all under 50 years old, [] are not [] designated as historically significant. Specifically, the Annex has been listed as non-contributory in all architectural surveys. Both of these newer state buildings were designed to be compatible in scale, massing, height, and setbacks to the buildings in the historic Civic Center (see Figures 33 and 34.a). [J-1, J-14, J-15, J-16]

Page 86, the last line of the second full paragraph is revised as follows:

More recently, the firm of Skidmore, Owings & Merrill was the architect for the Governor Edmund G. Brown State Office Building, Davies Symphony Hall, and a major addition to the rear of the Opera House (1976). [J-17]

Page 89, the second sentence of the first full paragraph is revised as follows to make a minor change in wording and to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District:

It is [] designated a Contributory building in the [] local Civic Center Historic District and is also designated a Contributory building within the National Register and National Historic Landmark Districts. [J-1, J-19]

Page 89, the reference in the second line of the second full paragraph should be to "Carey & Co." (not "Casey and Co."). [J-20]

Page 89, the last paragraph continuing to pages 93 and 95, is revised as follows to make minor changes in wording:

The California State Building is a granite-and-terra-cotta-clad steel-frame building, approximately 75 ft. high at the cornice line (the visual terminus of the building), with six stories of varying height. The original floor plan was ring-shaped at the lower stories, and T-shaped at the upper floors, with the leg of the "T" later forming one of the connections to the Annex. The building was designed in the Italian Renaissance style. The main McAllister Street facade and two side elevations on Polk and Larkin Streets are divided

horizontally into [] a three-part composition (base, middle, top), with a light rustication⁸ forming an overall background (see Figure 34.b, p. 88). The first three stories compose the base. This area is simply detailed with unframed, rectangular window openings as the primary relief. At the center of the McAllister Street facade the treatment changes. Here, three monumental arches, each two stories high, form the main entry to the building. Arches lead to a vaulted entry vestibule (see Figures 35.a and 35.b). The second [] part, or middle, of the [] main facade and side elevations, separated from the base by a horizontal belt course and balustrade, is divided into bays by colossal Corinthian pilasters. Monumental arches alternate in the bays with pedimented windows. A projecting cornice divides the [] middle from the top, which comprises an attic story and the roof. The attic [] story is simply detailed; rectangular windows alternate with shallow piers. Decorative cresting tops the wall, and a shallow hipped roof completes the structure (see Figure 34.b, p. 88). [J-26]

Page 101, the word "proposed" is deleted from the fourth line of the first paragraph to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District. [J-1]

Page 109, the following is added as a new paragraph following the first paragraph under Impact E.2:

Use of the State Historical Building Code could assist in cost-effective renovation or restoration of historic features as part of the project. [D-1]

Page 111, the word "proposed" is deleted from the first line of the first paragraph under Impact E.7 to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District. [J-1]

Page 116, Mitigation E.3.a. and the first sentence of the following paragraph are revised as follows:

The project would use the provisions for historic buildings in the Americans with Disabilities Act (ADA) and State Historical Building Code, as appropriate. These codes would also be used by the SHPO in their project review.

Provisions for retrofitting historic buildings contained in the ADA, as well the State Historical Building Code, would be used to lessen the impact of disabled access requirements to the California State Building. [D-1]

Page 116, the fourth sentence of the paragraph under Mitigation E.3.b is revised as follows:

Provisions for retrofitting historic buildings contained in the Americans with Disabilities Act, as well the State Historical Building Code, as applicable, would be used to lessen the impact of disabled access requirements in the California State Building. [D-1]

Page 119, the third and fourth sentences of the first full paragraph are revised as follows:

Prehistoric resources could include chert or obsidian flakes, projectile points, mortars and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources could include stone, brick or adobe foundations or walls; structures and remains with square nails; and refuse deposits such as old wells and privies. [G-13]

Page 121, the fourth sentence of the second paragraph is revised as follows:

Access from the Peninsula via U.S. 101 is provided via an off-ramp at 13th and Mission [] Streets. [K-2]

Page 121, the third and fourth sentences of the fourth paragraph are revised as follows:

A single lane in each direction on the section of I-280 between Army Street and U.S. 101 was reopened in April 1993 to allow traffic to connect to I-280 south of the U.S. 101 / I-280 interchange []. [] A temporary northbound connector from U.S. 101 to I-280 [] opened in [] August 1994 [] and a temporary southbound connector from I-280 to U.S. 101 opened in early 1995. [] [K-3]

Page 122, the fourth and fifth sentences of the second paragraph are replaced with the following text:

The August 1994 report presents six alternative freeway concepts for the Central Freeway corridor, including the section of U.S. 101 between Mission Street and the Oak/Fell on- and off-ramps. A second phase of the Central Freeway study, expected to be completed by August 1995, will take the alternatives proposed in the first study and to select a locally preferred alternative through a comprehensive planning effort. As of January 1995, the City is working out the final details of the scope of the second-phase study with Caltrans and expects to commence work in February.^{3a} [O-1]

Page 126, the fifth sentence of the paragraph under Parking is revised as follows:

On a typical weekday, the average for off-street parking lots and garages in the vicinity is approximately [] 66 percent occupied. [AA-2]

Page 126, the following text is added to the end of the paragraph under Parking:

The McAllister Street frontage of the project (between Larkin and Polk Streets) is currently designated for vanpool parking only between 6:00 a.m. and 9:00 a.m., Monday to Friday. Vanpools with permits can park there all day without the use of parking meters. [K-4]

Page 126, the following text is added as a new paragraph following the paragraph under Parking:

Forty parking spaces are provided on-site for the existing State Office Building and the Annex, including two spaces for disabled drivers; there is also space for approximately 10 bicycles. On-site parking is reserved exclusively for State officials; no on-site parking is provided for employees and visitors. [O-2]

Page 131, the seventh sentence of the last paragraph is revised as follows:

MUNI [] would receive the most new riders with about [] 53 percent (about [] 210 new riders (135 MUNI-only plus 75 MUNI to CalTrain or AC Transit)) []; BART would receive the second most new riders with about 34 percent (about 135 new riders). [I-2]

Page 132, the second sentence of the last paragraph is revised as follows:

The analysis for this EIR conservatively assumes that the proposed on-site parking would no less than replace the existing 40 on-site parking spaces, and therefore there would not be a net loss of on-site parking due to the project. [O-4]

Page 135, the following text is added following the third complete paragraph:

Jaywalking across Golden Gate Avenue between the existing Annex and the Federal Building is currently common because both of these buildings have mid-block entrances, and one-way traffic flow on Golden Gate Avenue provides a sense of diminished risk for people wishing to cross the street with (*i.e.*, they need to look for a gap in the traffic stream in only one direction). Expansion of state offices on the site with the project might increase the frequency of this illegal pedestrian movement. The project, however, would not be expected to significantly affect pedestrian safety, and would therefore not result in a significant impact. Possible measures to discourage jaywalking across Golden Gate Avenue, and their ramifications, are discussed below.

Increase Enforcement. The state could request that enforcement of the law prohibiting jaywalking be increased. The level of enforcement, however, is left to the discretion of the police and varies depending upon circumstances and priorities.

Physical Barriers and Signage. Measures to discourage pedestrians from crossing mid-block include landscaping, railings, or other physical barriers to divert pedestrians from the shortest path across Golden Gate Avenue between the two mid-block entrances. Signs could also be erected to discourage jaywalking. Each of these measures have limited effectiveness. Unless the landscaping or railing runs the entire length of the block, some pedestrians would continue to jaywalk by walking around or climbing over the barrier. In addition, if the curb in front of the entrance is used for passenger drop-off, a barrier would eliminate direct access to the building entrance. Signs do not present a physical impediment to jaywalking.

Mid-block Pedestrian Crosswalk. Mid-block crosswalk striping or a signal could be used to slow or stop traffic for pedestrians. Pedestrian volumes would need to meet signal warrants before a signal can be installed. Experience with mid-block signals, however, has shown that compliance is poor, pedestrians have a false sense of security, and pedestrian-activated signals are not always used.

The state would discuss potential measures to discourage jaywalking across Golden Gate Avenue with the U.S. General Services Administration, which is responsible for the Federal Building, prior to implementation of any actions. [K-7, O-7]

Page 139, the third sentence of the first paragraph under Impact F.6 is revised as follows:

Project construction would also take place at the same time that construction activities related to several other buildings in the Civic Center vicinity would occur, including construction at City Hall, Civic Auditorium, Brooks Hall, Opera House, New Main Library, San Francisco Courts Building, and the Federal Building. [K-9]

Page 140, the last sentence of the second full paragraph is revised as follows:

MUNI and/or Golden Gate Transit bus stops are located adjacent to the project site on Golden Gate Avenue at Polk and Larkin Streets, and on McAllister Street at Larkin Street; in addition, MUNI has relocated the bus stop on McAllister Street that was west of Polk Street to a location east of Polk Street because of construction of the San Francisco Courts Building. [K-11]

Page 140, the following is added to the end of the third full paragraph:

For a project under City jurisdiction, standard City traffic specifications state that no trucks are allowed to approach or leave a work site during the hours of 7:00 a.m. to 9:00 a.m., and 3:30 p.m. to 6:00 p.m., Monday through Friday, to minimize peak-period traffic congestion. [K-12]

Page 149, Mitigation Measure F.6 and the accompanying text is revised as follows:

Mitigation F.6: The project would adhere to the recommended actions and practices established by the Civic Center Coordinating Committee, as part of the *Construction Staging Areas, Street and Sidewalk Use Plan* currently being prepared.

A mitigation measure standard for projects in San Francisco modified for the project (as indicated by italicized text), which [] would also be adopted by the State, is as follows:

During the construction period, construction truck movement would be permitted only [] between 6:00 a.m. and 7:00 a.m., between 9:00 a.m. and 3:30 p.m., and after 6:00 p.m., to minimize peak-hour traffic (including transit) conflicts. The project sponsors and construction contractor(s) would meet with representatives of the City of San Francisco Department of Parking and Traffic (Traffic Engineering Division),

Fire Department, MUNI and Department of City Planning to determine feasible traffic mitigation measures to reduce traffic congestion and pedestrian circulation impacts during construction of this project and other nearby projects that are planned for construction or which later become known. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsors could coordinate with construction contractors for any concurrent nearby projects that are planned for construction or become known.

Some aspects of project construction, such as concrete delivery, might require deliveries prior to 9:00 a.m. Prior to initiating these construction tasks, the project managers would consult with the agencies listed above, as appropriate. [K-13]

Page 150, Endnote 3 is revised as follows:

- ³ Jerry Robbins, Transportation Planner [], San Francisco Department of Parking and Traffic; telephone conversation, April 13, 1994. [K-14]

Page 150, the following Endnote is added:

- ^{3a} Jerry Robbins, Transportation Planner, San Francisco Department of Parking and Traffic, telephone conversation, January 18, 1995. [O-1]

Page 151, Endnote 16 is revised as follows:

- ¹⁶ San Francisco Department of Public Works, Bureau of Architecture and Turner Construction Company, *San Francisco Civic Center Construction Staging Areas, Street and Sidewalk Use Plan, October* []1994. [K-15]

Page 154, the following new text is added as Endnote 4a:

- ^{4a} Ambient noise is defined in Section 2901.2 as "the average over 15 minutes excluding random or intermittent noises"; that is, ambient noise is background noise measured over 15-minute intervals. [EE-3]

Page 160, Mitigation Measure G.1.b. is revised as follows:

The project would prohibit truck and heavy equipment operations that would generate noise in excess of the ambient noise level by 5 dBA or more during the nighttime hours (8:00 p.m. to 7:00 a.m.) to minimize potential disturbance of adjacent residents. [EE-3]

Page 160, the following is added prior to "Mitigation G.3":

Mitigation G.2: No mitigation is required for Impact G.2. [G-11]

Page 160, the following is added after "Mitigation G.3":

Mitigation G.4: No mitigation is required for Impact G.4. [G-11]

Page 174, the last sentence of the second full paragraph is revised as follows:

The maximum credible earthquake on the San Andreas Fault is expected to have a magnitude of 7.8 based on modeling performed for the seismic retrofit study for the California State Building¹³. [B-1]

Page 174, the last sentence of the third full paragraph is deleted. [B-1]

Page 216, The following is added as a new sentence following the third sentence under "Traffic, Transit, Parking and Circulation":

In addition, the Asian Art Museum proposes to occupy the existing Main Library building following completion of the new Main Library and seismic retrofit of the existing library building. [M-19]

Page 220, the word "proposed" is deleted from the seventh line of the first paragraph to reflect the formal adoption by the City of San Francisco of a local Civic Center Historic District. [J-1]

Page 224, the first sentence of the second full paragraph is revised as follows:

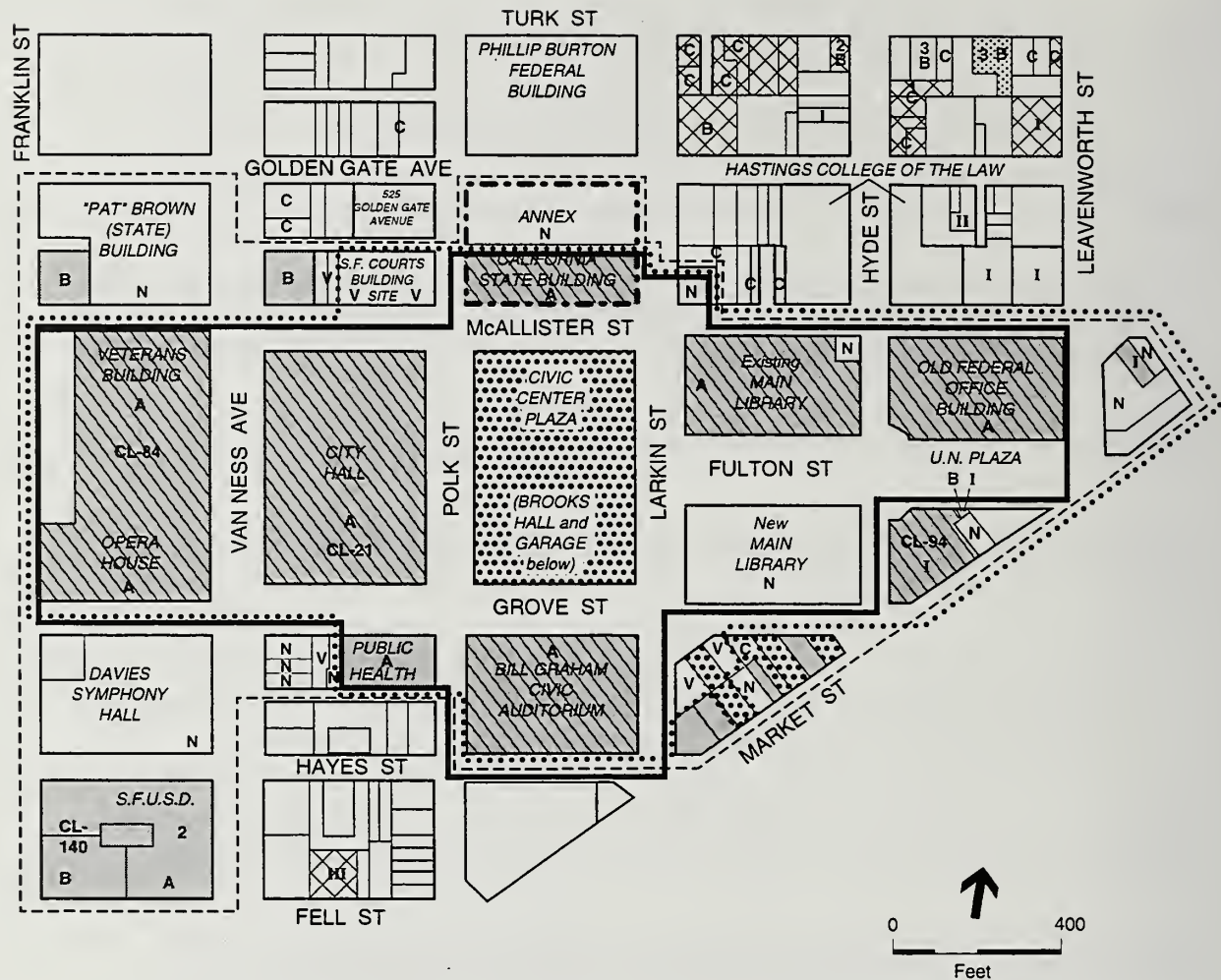
Wind effects of Alternative 2 would be similar or improved, compared to those of the proposed project, assuming the structure at 455 Golden Gate Avenue were to be designed similarly to the proposed project, including a canopy similar to that proposed.

Page 228, the second sentence of the third full paragraph is revised as follows:

On the basis of wind-tunnel testing data for the proposed project and for Alternative 2, it would be expected that Alternative 3 would have similar or improved wind conditions compared to the proposed project, assuming the structure at 455 Golden Gate Avenue were to include a canopy similar to that proposed with the project or other wind mitigation, such as a setback at about 60 feet in height on Golden Gate Avenue. [G-8]

Pages A-37 and A-39, the asterisk and footnote in Tables B-2 and B-4 is deleted and replaced with the following footnote:

H - Indicates exceedence of hazard criterion. [G-6]



Civic Center Historic District

- 1-5 DCP Rating (1976, Citywide)
- I-IV Downtown Plan (1984, C-3 Districts only)
- A-C Heritage Rating (non C-3 Districts only; from unpublished data)
- CL-21 City Landmark Number
- Project Site

- District Boundary
- Contributory
- Contributory / Altered
- N Noncontributory
- V Vacant Lot (noncontributory)

National Register of Historic Places

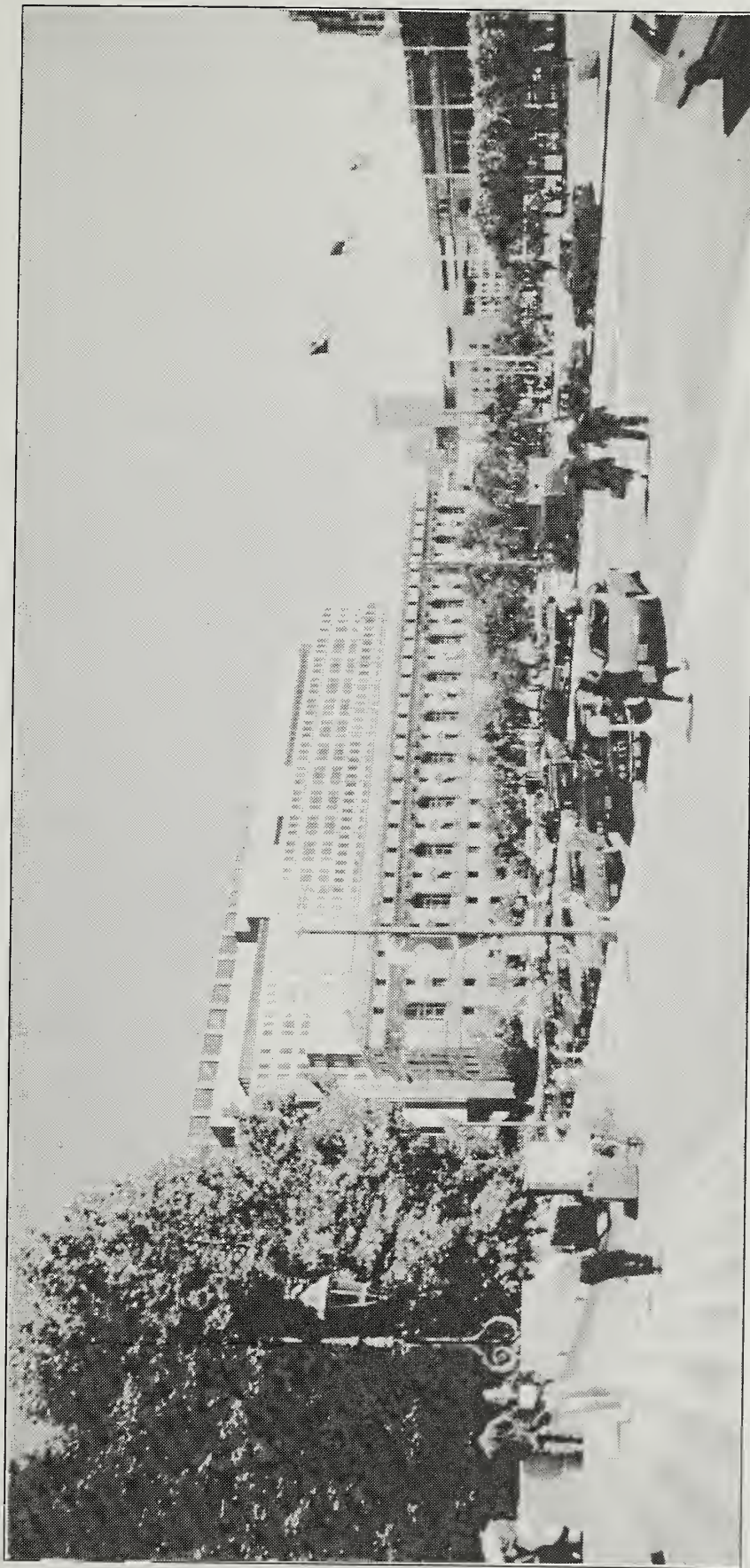
- Historic District Boundary
- National Historic Landmark District Boundary
- Historic Place (individually listed)
- Contributor to Listed District
- Contributor to Eligible (unlisted) District or Eligible for Separate Listing

SOURCE: San Francisco Department of City Planning; Downtown Plan; *Splendid Survivors*; Foundation for San Francisco's Architectural Heritage; State Office of Historic Preservation; Environmental Science Associates

State Office Building EIR ■

Figure 31 (Revised)

Architectural Resources in Project Vicinity



SOURCE: VIZABILITY

State Office Building EIR ■

Figure R-1

Photomontage of Proposed Project: View of Site Looking
Northeast from City Hall Steps at Polk Street



SOURCE: VIZability

State Office Building EIR ■

Figure R-2

Photomontage of Proposed Project: View of Site Looking
East From Golden Gate Avenue West of Polk Street

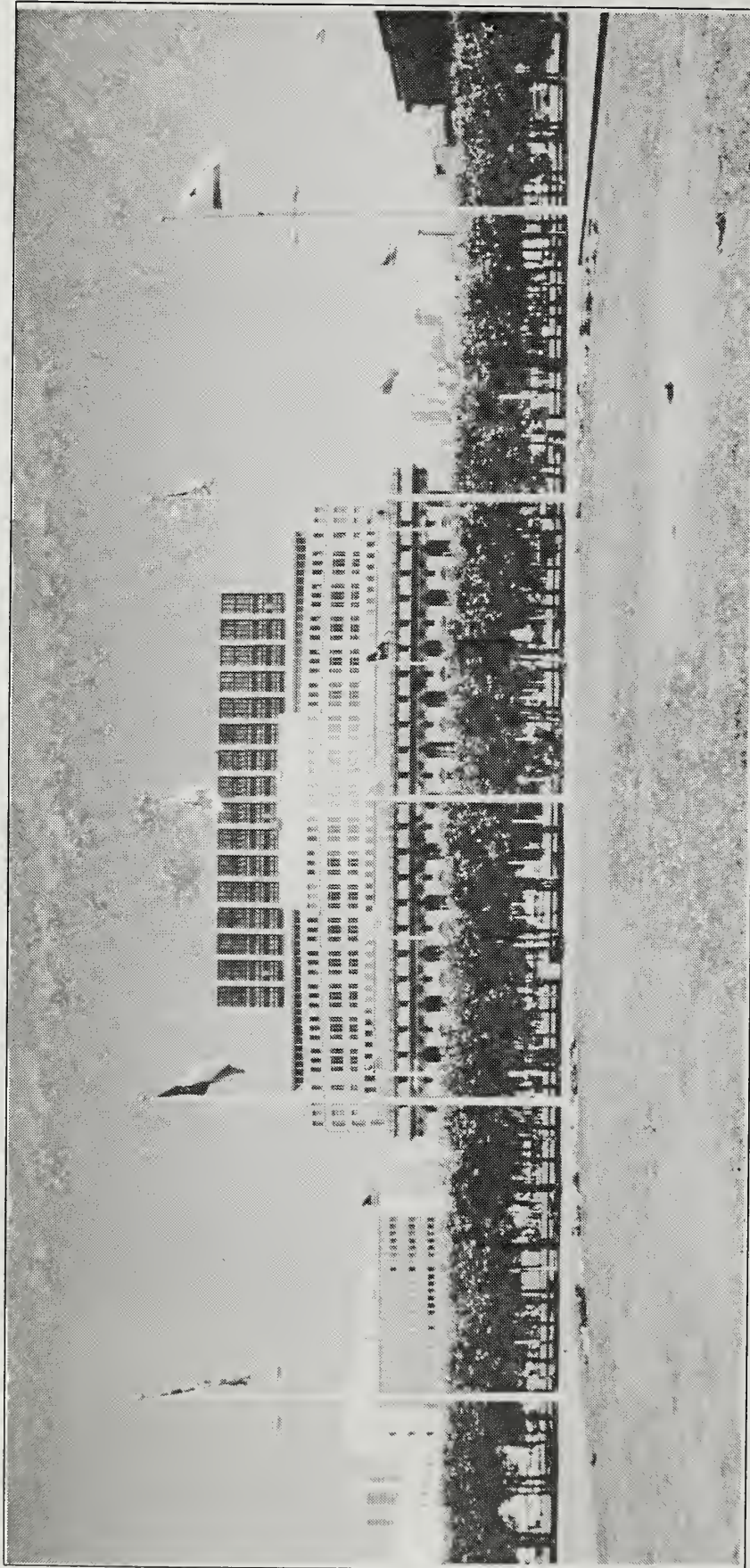


State Office Building EIR ■

Figure R-3

Photomontage of Alternative 2:
View Northwest Across Civic Center

SOURCE: VIZability

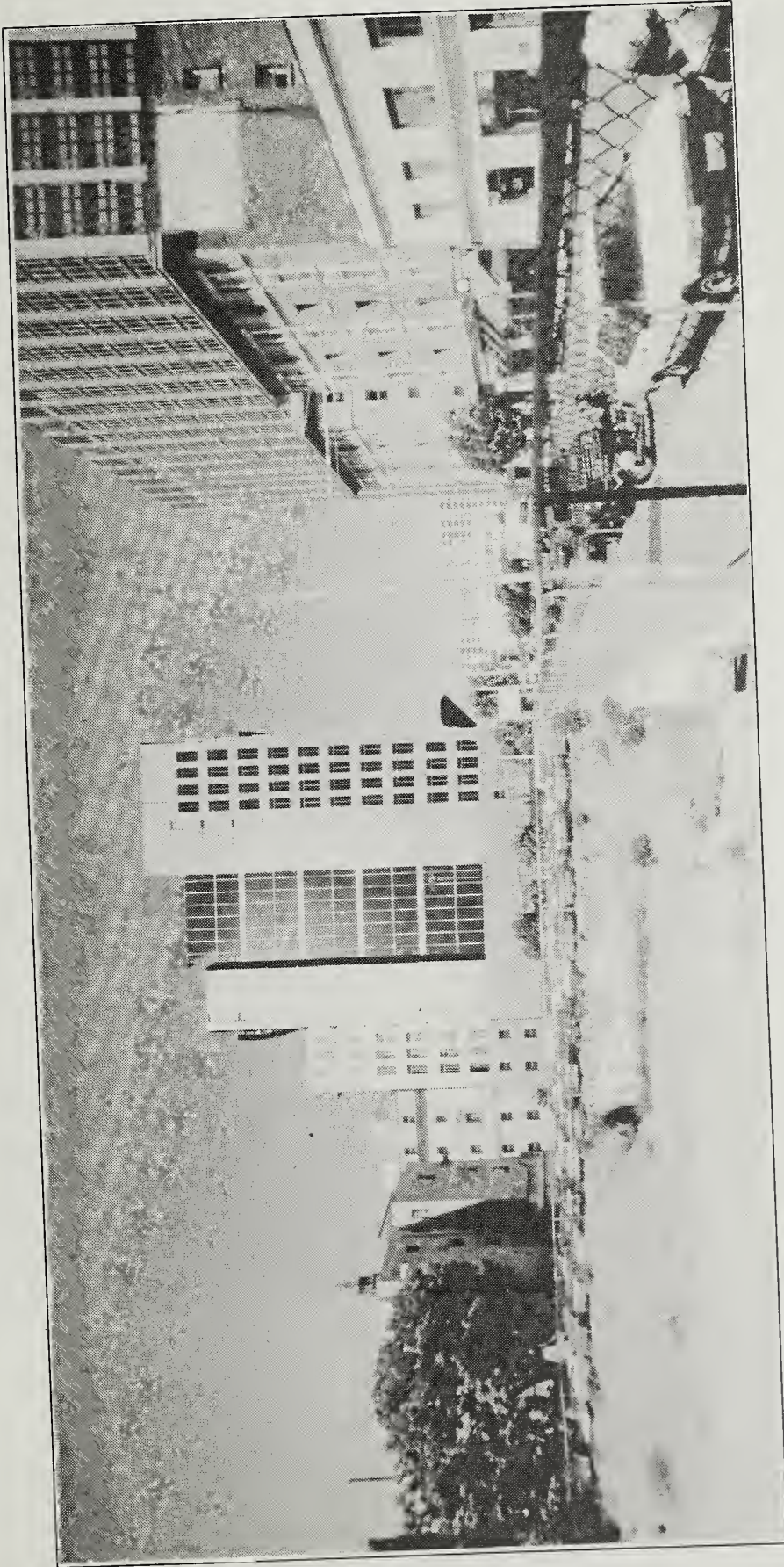


SOURCE: VIZability

State Office Building EIR ■

Figure R-4

Photomontage of Alternative 2:
View of Site Looking North From Civic Center Plaza



State Office Building EIR ■

Figure R-5

Photomontage of Alternative 2:
View of Site Looking West From Golden Gate
Avenue Near Larkin Street

SOURCE: VIZability



Figure R-6

Photomontage of Alternative 2: View of Site Looking
Northeast From City Hall Steps at Polk Street

SOURCE: VIZability



SOURCE: VIZability

State Office Building EIR ■

Figure R-7

Photomontage of Alternative 2: View of Site Looking
East From Golden Gate Avenue West of Polk Street

III. WRITTEN COMMENTS AND RESPONSES

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO, CA 95814

December 23, 1994

CHRISTAL WATERS
DEPARTMENT OF GENERAL SERVICES
400 R STREET, SUITE 5100
SACRAMENTO, CA 95814

Subject: SAN FRANCISCO CIVIC CENTER COMPLEX, STATE OF CALIF. C SCH #: 94011008

Dear CHRISTAL WATERS:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency." A-1

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Mark Goss at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Michael Chiriatti', with a stylized flourish at the end.

Michael Chiriatti, Jr.
Chief, State Clearinghouse

Enclosures

cc: Resources Agency

Notice of Completion

Appendix F

See NOTE below

Mail to: State Clearinghouse, 1400 Ninth Street, Sacramento, CA 95814 916/445-0613

SCH # **94011008**

Project Title: State of California San Francisco Civic Center Complex

Lead Agency: San Francisco State Building Authority & Dept. of General Services Christal Waters

Street Address: OPDM, 400 R Street, Suite 5100

Phone: (916) 324-0206

City: Sacramento

Zip: 95814

County: Sacramento

Project Location

County: San Francisco City/Nearest Community: San Francisco

Grant Street: McAllister/Polk Total Acres: 1 full block

Assessor's Parcel No. Block 769, Lots 2 & 3 Section: _____ Top: _____ Range: _____ Base: _____

Within 3 Miles: State Hwy to US 101 Waterways: San Francisco Bay

Airport: _____ Railways: _____ Schools: _____

Document Type

CEQA: ☐ NOP ☐ Supplemental EIS/Impact ☐ NEPA: ☐ NOI ☐ Other: ☐ Joint Document
☐ Early Conc ☐ EIS (Prior SCH No.) ☐ EA ☐ Final Document
☐ Neg Dec ☐ Other ☐ Draft EIS ☐ Other
☐ Draft EIS ☐ FONSI

Local Action Type

☐ General Plan Update ☐ Specific Plan ☐ Ransom ☐ Amendment
☐ General Plan Amendment ☐ Master Plan ☐ Promote ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, Parcel Map, Tract Map, etc.) ☒ Other: Office Building

Development Type

☐ Residential: Units _____ Acres _____ ☐ Water Facilities: Type _____ MOD _____
☐ Office: Sq. Ft. 1 M Acres _____ Employees 2500 ☐ Transportation: Type _____
☐ Commercial: Sq. Ft. _____ Acres _____ Employees _____ ☐ Mining: Mineral
☐ Industrial: Sq. Ft. _____ Acres _____ Employees _____ ☐ Power: Type _____ Wells _____
☐ Educational _____ ☐ Waste Treatment Type _____
☐ Recreational _____ ☐ Hazardous Waste Type _____
☐ Other: _____

Project Issues Discussed in Document

☒ Aesthetics/Visual ☐ Flood Plain/Flooding ☐ Schools/Universities ☒ Water Quality
☒ Agricultural Land ☐ Power Land/Fire Hazard ☐ Septic Systems ☐ Water Supply/Groundwater
☒ Air Quality ☒ Geologic/Seismic ☐ Sewer Capacity ☐ Wetland/Riparian
☒ Archaeological/Historical ☐ Minerals ☐ Soil Erosion/Compaction/Grading ☐ Wildlife
☐ Coastal Zone ☒ Noise ☐ Solid Waste ☒ Growth Inducing
☐ Drainage/Absorption ☒ Population/Housing Balance ☒ Toxics/Hazardous ☒ Land Use
☐ Economic/Job ☐ Public Services/Facilities ☒ Traffic/Circulation ☒ Cumulative Effects
☐ Fiscal ☐ Recreation/Parks ☐ Vegetation ☒ Other: Wind Shade

Present Land Use/Zoning/General Plan Use's

State Office Buildings/Public Use District

Project Description

Renovation and reuse of California State Building at 350 McAllister, and construction of new office building at 455 Golden Gate Ave.



CLEARINGHOUSE CONTACT: Michael Chiriatto
(916) 445-0613

STATE REVIEW BEGAN: 10-8-94
 DEPT REV TO AGENCY: 12-16
 AGENCY REV TO SCH: 12-21
 SCH COMPLIANCE: 12-23

CNT ENT

☒ Resources

CNT ENT

State/Consumer Evos

PLEASE NOTE SCH NUMBER ON ALL COMMENTS

PLEASE FORWARD LATE COMMENTS DIRECTLY TO THE LEAD AGENCY ONLY

ACQD/APCD: 2 (Resources: 11/12)

☒ Conservation
☒ Fish & Game
☒ Parks & Rec
☒ Reg. WQS
☒ Caltrans
☒ TRANS Planning
☒ Planning & Dev
☒ State Lands Com

(*g) = sent by lead / ** = sent by SCH

III. Written Comments and Responses

Letter A - Michael Chiriatti, Jr., Chief, State Clearinghouse, Governor's Office of Planning and Research, December 23, 1994

- A-1) Comment noted. Responses to written comments from the Division of Mines and Geology, Department of Conservation; Office of Historic Preservation, Department of Parks and Recreation; and State Historical Building Safety Board, Department of General Services, appear on the following pages.

M E M O R A N D U M

To: Project Coordinator
Resources Agency

Date: December 8, 1994

Ms. Christal Waters, Senior Environmental Planner
San Francisco State Building Authority/
California Department of General Services
400 R Street, Suite 5100
Sacramento, CA 95814

From: Department of Conservation
Governmental and Environmental Relations

Subject: San Francisco Civic Center Complex- Draft EIR: SCH# 94011008

The Department of Conservation has reviewed the Draft Environmental Impact Report (DEIR) for the San Francisco Civic Center Complex. The Department's Division of Mines and Geology (DMG) has special expertise in evaluating geologic/seismic hazards and mineral resource issues.

A. Background

According to the DEIR, the proposed project consists of renovation and reuse of the historic California State Building at 350 McAllister Street, and construction of a new building at the site of the Annex at 455 Golden Gate Avenue (to be demolished). The new building would range from 11 to 16 stories in height. The DEIR identifies potentially significant impacts related to geologic and seismic hazards, but determines that project actions would mitigate these impacts below a level of significance. As mitigation, the design and construction of the new building, and renovation of the existing building, are "to meet the most current seismic standards". The DEIR notes that the existing State building was vacated because of damage sustained during the Loma Prieta earthquake (p.175).

B. Comments

(1) Project Geologic/Geotechnical Conditions and Considerations:

a) The Department requests that the Final EIR be amended to clarify several statements concerning information reportedly determined and/or "mandated" by DMG:

- i) Although the DEIR states that the San Andreas fault experienced a magnitude 8.3 earthquake in 1906, it further states "*the maximum credible earthquake on the San Andreas Fault is expected to have a magnitude of 7.8 based on modeling performed for the seismic retrofit study for the California State Building; however CDMG mandates a (MCE) of 8.0 on this fault*" (p.174).

Besides appearing to provide contradictory estimates of historic earthquakes and seismic potential (apparently owing to use of different magnitude scales), it is inappropriate for the DEIR to indicate that DMG (often referred to as "CDMG") has "mandated" information for project evaluation. DMG does not mandate such information, and has not been involved with this project.

Furthermore, this DEIR section appears to describe seismic design criteria different than *probabilistic* criteria described elsewhere in the DEIR (see [2.] below).

B-1

- ii) *Likewise the DEIR states that "CDMG mandates a maximum credible earthquake of 7.5 on (the Hayward) fault" (p.174). Again, DMG has not mandated such information or otherwise been involved with this project.*

Apparently, the above statements were extracted from a project consulting report. The Department requests that the Final EIR clarify that project reports were not developed with input, advice, or mandates from DMG. Furthermore, the Department requests that copies of these reports be sent to DMG.

b) The Department recommends that the Final EIR fully address the potential for deleterious geotechnical conditions specifically for the site of the existing building, and how project mitigation measures will minimize this potential. The abridged geotechnical data provided in the DEIR can be interpreted to indicate that adverse soil conditions occur beneath both project sites. Although any problematic near-surface soils are likely to be removed by the basement and foundation excavation for the new structure, the DEIR does not indicate how such concerns would be addressed for the existing structure beyond stating that it will have a "*strengthened*" foundation.

c) The Department recommends that all project geotechnical reports be included as appendices to the Final EIR. The geotechnical investigation and seismic design recommendations come from various geotechnical consulting reports listed in DEIR references. Confirmation of DEIR conclusions about safe design of project structures/foundations generally requires review of project geotechnical reports. Examination of these reports would also allow confirmation of specific geotechnical evaluations given in the DEIR and their applicability to both the new and existing project buildings locations (e.g., settlement estimates for the project "site", p.176).

(2) Seismic Impact Mitigation:

The Department recommends that the Final EIR clarify the seismic design standards to be applied to new project construction and existing building renovation.

The DEIR appears to provide three sources of seismic design criteria. On p. 178, the DEIR states that both the new building and the existing building would "*meet, or exceed, the seismic force resistance requirements of the 1994 Uniform Building Code and would meet the structural standards of Title 24 of the California Code of Regulations*". The DEIR also states that seismic design criteria for the project "*have been established using the Seismic Performance Goals contained in the Policy on Acceptable Levels of Earthquake Risk in State Buildings, a report by the California Seismic Safety Commission dated January 1992*".

The Uniform Building Code (UBC) generally provides for a single seismic design standard (e.g., a 475-year-return-period seismic event). We understand that Title 24, which is currently based on the 1991 UBC, provides two-level seismic design criteria (475-year and 1000-year seismic events). The DEIR indicates that design criteria "goals" provided in the Policy on Acceptable Levels of Earthquake Risk in State Buildings report provide for a different two-level earthquake design, namely a 72-year return period lower-level event and 475-year return period upper-level event. The DEIR should clarify the applicability of Title 24 seismic design criteria relative to the CSSC criteria.

B-1
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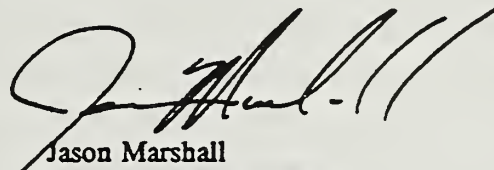
B-2

B-3

B-4

C. Closure

The Department stresses that DMG has not been involved in project evaluation or otherwise provided seismic design criteria. The Department requests that the above comments be adequately addressed for the development of the Final EIR for this project. If you have any questions regarding these comments or need assistance please contact me at (916) 445-8733, or the Division of Mines and Geology Environmental Review Project Manager at (916) 323-4399.



Jason Marshall
Environmental Analyst

cc: Jeff Howard, Division of Mines and Geology

Letter B - Jason Marshall, Environmental Analyst, California Department of Conservation,
December 8, 1994

- B-1) The information in the Draft EIR, p. 174, regarding maximum credible earthquakes, was obtained from a report by Dames & Moore entitled *Site Specific Seismic Hazard Analysis*, December 30, 1991. That report is appended to the report by Harlan Tait Associates entitled *Geotechnical Investigation, Seismic Retrofit*, December 21, 1992. As noted in the comment, and clarified in discussions with the commenter, the California Division of Mines and Geology (DMG) does not mandate maximum credible earthquakes on any faults, and to date, DMG has not been involved in this project. Please see Chapter II, Revisions to the Draft EIR, for changes to p. 174 of the Draft EIR text.

The Draft EIR, p. 174, discusses the seismic history of the major faults in the project area and includes the magnitudes of the earthquakes that have occurred or are expected to occur on each fault. As the commenter suggests, the apparent discrepancy between historic earthquakes and seismic potential is due to use of different magnitude scales. The magnitudes of older historical earthquakes, which occurred prior to the development of magnitude scales by seismologists, normally are based on an estimate of an appropriate Gutenberg - Richter Local Magnitude. For the 1906 earthquake, the most often quoted Richter Magnitude is 8.3. For more recent large earthquakes, above magnitude 7, the Moment Magnitude is considered to be the best means of characterization of the earthquake energy. The 1991 Dames & Moore report used Moment Magnitudes for both probabilistic and deterministic earthquake evaluations. For the San Andreas Fault, the maximum credible earthquake is expected to have a maximum Moment Magnitude of 7.8, which represents an earthquake similar to the 1906 earthquake on this fault. For the Hayward Fault, the maximum credible earthquake is expected to have a maximum Moment Magnitude of 7.0.

This section of the Draft EIR, p. 174, is part of the setting conditions regarding seismicity, rather than seismic design criteria for the proposed project, which are presented on pp. 178 and 179 of the Draft EIR, and discussed further in the response to Comment B-4 below.

As requested by DMG, copies of the geotechnical reference documents used in the preparation of the EIR have been sent to DMG.

- B-2) The Draft EIR, pp. 175 and 176, summarizes the potential geologic hazards at the project site based on preliminary seismic hazard analysis prepared for the California State Building. As stated in the Draft EIR, the primary concerns include ground shaking, with secondary effects including liquefaction and differential compaction. Other hazards related to earthquakes that were considered include landsliding, subsidence, tsunami inundation, and inundation from reservoir failure; these hazards are considered to be absent at the project site. In addition, as described on p. 173, groundwater at the site is relatively shallow and it would be necessary to excavate and remove or densify existing backfill around existing foundations.

These potential geologic hazards (or potential "deleterious geotechnical conditions" as stated by the commenter) would be addressed during the final design of the proposed the New State Office Building and California State Building. As part of the final design process, a final geotechnical report would be prepared that would identify the potentially deleterious conditions at the site and make site-specific recommendations based on the specific design requirements of the New State Office Building and the California State Building to minimize the potential for any such hazards (see Mitigation Measures I.2 and I.3, Draft EIR pp. 179 and 180). As stated in Mitigation Measure I.2, the contractor would be required to comply with all of the recommendations in the final geotechnical report, including recommendations for foundation design, foundation drainage, and removal or densification of backfill around existing foundations. The California Division of Mines and Geology will be provided a copy of the final geotechnical report.

- B-3) Technical reports referenced in the Draft EIR are available for public review as part of the project file, and if specifically requested, copies of these reports can be sent to individuals. As requested, the background geotechnical reports have been sent to the DMG. Including the reports as appendices to the EIR would not be appropriate for most EIR readers.
- B-4) The comments states that the Draft EIR is not clear in which seismic criteria is being used for the project: Title 24 of the California Code of Regulations, the State Historic Building Code, or the *Policy on Acceptable Levels of Earthquake Risk in State Buildings (Policy)*. The project would be built to Title 24 standards.

The comment confuses the seismic events for which the project must be designed by stating that Title 24 provides two-level seismic design criteria (475-year and 1000-year

seismic events), and the *Policy* provides for a different two-level earthquake design (72-year and a 475-year seismic events). Title 24 applies a 475-year and 1000-year return period for seismic events to the design for hospitals only; this design standard does not apply to office buildings.

Title 24 includes Part 8, which is the State Historic Building Code. The State Historic Building Code does not imply a lower level of safety for building occupants than Title 24.

Title 24 contains the minimum design standard for buildings. The *Policy* identifies performance objectives for the action of a building under certain earthquake conditions. The project design would meet Title 24 standards and be consistent with the performance standards in the *Policy*. Title 24 design standards and the *Policy's* performance standards are similar in their protection of life safety.

In addition to life safety performance objectives, the *Policy* also contains direction to protect the state's investment in its property. Both buildings, since they would be connected, house important state operations, and be bond funded, would be subject to these performance objectives. They require that, in the event of an earthquake of 50 percent probability in 50 years, the buildings must allow immediate occupancy, minimal post-earthquake disruption, and some non-structural clean-up.

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
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December 19, 1994

Christal Waters, Senior Environmental Planner
Office of Project Development and Management
400 R Street
Sacramento, CA 95814

**Re: Response to the Draft Environmental Impact Report for the
State of California San Francisco Civic Center Complex**

Dear Ms. Waters:

Thank you for the opportunity to respond to the DEIR for the San Francisco Civic Center Project.

The State Office of Historic Preservation is responsible for the implementation of both federal and state programs of historic preservation. The SHPO makes eligibility determinations for the listing of properties on the National Register of Historic Places, California Landmarks and Points of Interest, and the California Register of Historical Resources. Additionally, the office is mandated under Public Resources Code section 5024.6(j) "...to review and comment on the impact on historical resources of publicly funded projects and programs undertaken by other government agencies," and under section 5024.5 "...the officer may monitor implementation of proposed actions of any state agency." Executive Order W-26-92 gives the State office of Historic Preservation broad jurisdiction to provide leadership and coordination of state agency efforts to carry out their preservation stewardship obligations.

The State Office of Historic Preservation has a strong interest in the San Francisco Civic Center Project, both because it will affect one of the finest examples of monumental civic architecture in the United States and because this office has been actively involved in project consultation throughout the initial design-build planning phase of the project.

Impact Mitigation of Construction of a New State Office Building

In considering conformance with existing land use plans and policies, visual impacts, impacts to historical resources and cumulative impacts, the DEIR

C-1

does not present substantial evidence in the record to support its conclusion that the height and massing of the new building does not cause a significant environmental impact on the historic California State Office Building and the character and setting of the Civic Center National Landmark District.

The preferred project will replace the existing Annex to the California State Building with an 845,000 square foot office building which will range in height from 13 stories, directly behind the historic State Building, to 16 stories fronting on the Golden Gate Avenue. This proposed building is substantially larger in height, scale and massing than the adjacent historic California State Office Building and the Beaux Arts Civic Center complex. It is also substantially in excess of the 80-foot height limit imposed by the San Francisco City Planning Code and in the Administrative Draft of the Civic Center Area Plan.

The DEIR concludes that the height and mass of the proposed project is substantially in conformance with land use plans and policies as expressed in the above referenced documents [DEIR p. S-4; pp.29-44].

The height limitation and many of the Civic Center Plan goals, land use, and design policies were adopted to protect the integrity and character of the Civic Center historic district and its setting. These policies include, among other considerations, criteria requiring that new construction "enhance the architectural character of the area through proper design of new buildings..."[Revised Civic Center Plan as quoted on p 37]; to "Promote harmony in building heights in the larger Civic Center area..."[Revised Civic Center Plan, Land Use Objective. Objective 2];" and "Adhere to architectural design guidelines that build on the characteristics of the core Beaux Arts buildings [Revised Civic Center Plan, Urban Design, Policy 3].

C-1
cont'd.

The DEIR does not apply the Secretary of the Interior's Standards in evaluating impacts of the height and massing of the new construction. The Secretary's Standards are used elsewhere in the DEIR as the criteria for ascertaining whether a substantial adverse change in the significance of an historical resource could or will occur [DEIR p. 101, 113 115]. The failure to apply these same standards in evaluating the impact of height and massing would appear to be a major inconsistency in the line of reasoning presented in the DEIR. A consideration of the impact of height and massing of the new construction is additionally important because proportion and scale are essential aspects of Beaux Arts classicism.

The Secretary of the Interior's Standards 2 and 9 clearly address compatible design in additions, alterations and environmental

settings of historic buildings and districts. The National Park Service has provided additional assistance in interpreting these Standards in a series of Technical Preservation Services publications. In addressing contemporary additions to historic buildings the Park Service emphasizes that size and scale of additions must be proportionate to the historic building, that uses requiring new addition or alternations that overpower the scale of historic buildings are not compatible, and that preservation of the historic setting requires that the context of the building be maintained and that it should not be overwhelmed by new construction [Technical Preservation Services, Interpreting the Secretary of the Interior's Standards, numbers 80-002,82-026, 83-051,].

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The argument in the DEIR that the impact of new construction is somehow lessened because it will create a "transition" between the low height historic district and the existing out-of- scale federal office building is inaccurate and misleading. The fact that an intrusive element already exists in close proximity to the historic district does not lessen the impact of introducing another disproportionate element.

Impacts to Historic California State Building Resulting From Structural Upgrade

The potential for alteration to very significant and significant interior architectural spaces in the historic building is addressed, and presumed to be reduced to a level of insignificance, by mitigations set forth in DEIR Mitigations E.1.d and E.1.e. In the DEIR the nature, frequency, and degree of consultation with the SHPO are unspecified. In light of the requirements of CEQA that a mitigation program must be designed to ensure compliance during project implementation [PRC section 21081.6(a)], an explicit and specific reporting and monitoring program should be adopted as part of the findings of the lead agency.

C-2

Similarly, a mitigation monitoring program should be adopted as part of the findings of the lead agency to ensure implementation of Mitigation E.3.c regarding compliance with Americans with Disabilities Act.

Alternative Analysis

Alternative 2 : Renovate and Reuse 525 Golden Gate Ave with smaller New State Office Building

The alternative discussion assumes all impacts on the restorations of the California State Building to be the same as the preferred alternative. However, it does not address the effect on the historic district and setting that would result

C-3

from the reduction in size and massing due to shifting part of the project square footage requirements to the building at 525 Golden Gate Avenue. A reduction in the mass of the new building would presumably lessen the impacts on the historic district.

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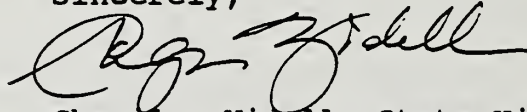
Alternative 4: Base-Isolation Structural System for the California State Building

The analysis of this alternative asserts that the introduction of a 24 inch wide moat would have an adverse effect on the California State Building exterior. The SHPO would point out that base isolation has been used as a means of stabilizing several significant historic buildings, including the Los Angeles City Hall and the Oakland City Hall. In none of these situations was the moat found to be a significant adverse impact. There is no information in the DEIR which appears to support a different conclusion in this case.

C-4

Thank you for the opportunity to comment on the DEIR. The State Office of Historic Preservation looks forward to continued involvement and participation in this project.

Sincerely,



Cheryl Widell, State Historic
Preservation Officer

Letter C - Cherilyn Widell, State Historic Preservation Officer, Office of Historic Preservation, Department of Parks and Recreation, December 19, 1994

- C-1) Subsequent to submitting the preceding letter of comment, the State Historic Preservation Officer (SHPO) submitted a second letter to the Department of General Services, Office of Project Development and Management (OPDM), in response to a letter from OPDM explaining further the DEIR conclusions that the proposed project's visual effects and effects on the California State Building and the Civic Center historic districts would not be significant. The second SHPO letter stated that the OPDM memorandum provides substantial evidence that "the height and massing of the new building at 455 Golden Gate does not cause a significant environmental impact to the historic California State Building or to the character and setting of the Civic Center National Historic Landmark District." The following responses to Comment C-1 are provided for information. The OPDM letter to the SHPO, dated March 6, 1995, and the SHPO response, dated March 17, 1995, appear in the Appendix of this Final EIR Addendum.

Regarding effects on architectural resources, the Draft EIR concluded that the project would not have a significant effect on the historic California State Building or on the National Register Historic District, National Historic Landmark District, or the then-proposed and now adopted local historic district, as stated on p. 111 of the Draft EIR, based on the following significance criteria, which appear on p. 101:

A project that would alter a contributory building of a National Register District in a manner that would not conform to the Secretary of the Interior's Standards for Rehabilitation, could lead to a finding by the State Historic Preservation Officer that the building would no longer be considered contributory. New construction within the proposed local Historic District would be reviewed for compatibility with the other resources of the district. A project that was substantially incompatible would affect the district's continued designation. Therefore, a project that would create a substantial adverse effect on a designated historic or architectural resource or historic district would have a significant environmental effect.

The following discussion amplifies the analysis in the Draft EIR, and incorporates Standards No. 2 and No. 9 of the Secretary of the Interior's Standards for Rehabilitation, which read as follows:

2. The historic character of a property shall be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property shall be avoided.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and shall be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

Regarding the relationship of the proposed New State Office Building to the California State Building, the new building, while physically connected to the historic building, would be a separate structure, as is the existing Annex. As stated on p. 111, "The project would maintain the California State Building as the architectural element directly facing the north side of Civic Center Plaza, and would not directly change the urban design characteristics of the Beaux Arts-style buildings of the Civic Center core."

According to the design-build team, the new building would defer to the California State Building by "funneling down" its mass as it approaches the historic building. The vertical layering of the new building would scale the structure into smaller components that would serve to reduce the apparent mass of the new building. The component closest to the California State Building (which would be 11 stories, not 13 stories as stated by the commenter) would have an A-B-A-B rhythm in its mass-to-void ratio and a cornice line, both of which are reflective of the Beaux Arts style. The very open curve of the second vertical component is intended to focus the viewer's eye on the center and reduce the visual weight of the outer corners. The increasingly simple design of the south facade, as the building approaches Golden Gate Avenue, is intended to keep the new building as a background element and would prevent it from overwhelming the California State Building.

The design architect for the New State Office Building has explained the building's compatibility with the California State Building and the Civic Center as follows:

Viewed from the Civic Center, the building reaches its full height only as it approaches the adjoining urban district. Stepping back and up from the historic building, the new Annex appears to recede from it without losing the formality and civic presence that its location requires. It also achieves a scale that is consistent with the Civic Center, despite the overall size of the building. The landscaping of

the building - its street trees, plantings and gardens - also reinforce its strong connection to the features and plan of the historic district.¹

The project would demolish the existing Annex, which is not a historic structure, and would renovate the historic California State Building; with Mitigation Measures E.1 through E.4, identified on Draft EIR pp. 113-117, effects on the historic building would be less-than-significant. The historic character of the site would thus be retained and preserved, distinctive materials would be retained and features, spaces, and spatial relationships that characterize the California State Building would be retained, as called for in Standard No. 2 of the Secretary's Standards.

Regarding the relationship of the proposed New State Office Building to the historic districts, the visible facades of the new building would be outside both national districts and within the local district.

Demolition of the existing Annex and construction of the New State Office Building would not affect the integrity of the national or local historic districts, the principal distinguishing feature of which is the composition of Beaux Arts structures centered around City Hall. The National Register Historic District nomination form states:

Within the scope of turn of the century classical architecture in the United States, the San Francisco Civic Center contains several fine examples of the mode and one superlative example in the City Hall. The other buildings in the group, however, although less interesting in themselves, cannot be judged in the same way. In particular the [California] State Building, the [Old] Federal Building [on United Nations Plaza], the [Department of Public] Health Building [at Polk and Grove Streets] and the War Memorial Group would probably appear rather dull in themselves, as if they were missing an essential ingredient. But seen in the context of the Civic Center as a whole, and in relation to City Hall, all the buildings together achieve distinction.

The criteria on which the buildings are judged, then, must be the degree to which each enhances the group without distracting from the City Hall. These qualities are achieved through a harmony of color, material, scale, size, texture, rhythm, and style. Within these constrictions the buildings achieve individual interest through the imaginative manipulation of the elements. These are the criteria on which the architects of the buildings would have wanted them to be judged.

¹ HSH Design-Build, Inc., State of California Civic Center Complex, San Francisco, Design Proposal, August 9, 1994

The Draft EIR, in its analysis of Cultural (Architectural) Resources, on p. 111, states that, with construction of the proposed New State Office Building, City Hall and its 300-foot-tall dome would remain a major visual landmark in the Civic Center. The New State Office Building would not significantly distract the focus from City Hall, the key element in the group of Beaux Arts buildings that make up the principal structures in the Civic Center historic districts. (See Figure 22, p. 55 of the Draft EIR, the most conservative angle from which to judge the relative importance to the historic districts of City Hall and the New State Office Building. In Figure 22, City Hall, with the dome as its centerpiece, can be seen to stand out as the most important element, despite the clear presence of the New State Office Building.)

The New State Office Building would appear as a new visual element and, when viewed to the north from Civic Center Plaza, would alter the view that includes the historic California State Building, as stated on p. 51 of the Draft EIR and illustrated in Figure 24, p. 57. The new building would partially screen, and therefore would reduce the dominance of, the existing Philip Burton Federal Building, at 450 McAllister Street, on the northern edge of the district. CEQA requires the project to be reviewed in its existing setting. Thus, the Federal Building cannot be excluded from the analysis of project effects on the district. With its lighter coloring, the New State Office Building would be intended to serve as a more understated backdrop to the California State Building than does the Federal Building, whose darker coloring and modern style more directly competes with City Hall. (Again, see Figure 22, p. 55 of the Draft EIR.) Some commenters have noted that the new building, while partially screening the Federal Building, would be closer to the heart of the Civic Center and would thus have a greater effect on architectural and visual resources, despite being about 90 feet shorter than the Federal Building. As stated above, however, the New State Office Building would not significantly affect the spatial relationship of other principal Civic Center buildings to City Hall. Therefore, the project would protect the integrity of the historic districts, as called for in Standard No. 9 of the Secretary's Standards.

Further detail in regard to the Secretary's Standards as they relate to Alterations/Additions for New Use in a [Historic] District is provided in "The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings," published by the National Park Service. Among the recommended actions are the following, each of which is followed by a brief discussion of the proposed project's consistency:

Guideline: Designing required new parking so that it is as unobtrusive as possible, i.e., on side streets or at the rear of buildings. "Shared" parking should also be planned so that several business[es] can utilize one parking area as opposed to introducing random multiple lots.

Consistency: The parking in the proposed project would be underground, and would not be visible from the exterior of the historic California State Building or the New State Office Building.

Guideline: Designing and constructing new additions to historic buildings when required by the new use. New work should be compatible with the historic character of the district or neighborhood in terms of size, scale, design, material, color and texture.

Consistency: The New State Office Building would reflect, but would not mimic, the Beaux Arts style, and would use similar materials, colors and textures. The use of vertical components would bring the new building into scale with the California State Building. As stated in the Draft EIR on p. S-3, the facades of the New State Office Building are "intended to be a contemporary design compatible with the California State Building." The size of the New State Office Building at the rear (Golden Gate Avenue) side of the property is necessary for the program. It also would serve to screen the Federal Building.

Guideline: Removing nonsignificant buildings, additions or streetscape and landscape features which detract from the historic character of the district or the neighborhood.

Consistency: The project would remove the existing nonsignificant Annex at 455 Golden Gate Avenue, which is not compatible in design with the California State Building. The project also would at least partially screen the Federal Building, with its darker color and more modern style, both of which are incompatible with the historic districts, in views north from the Civic Center.

Regarding visual effects, the Draft EIR preparers used the following significance criteria in evaluating the project's effects relative to visual and design factors, as stated on p. 51 of the Draft EIR:

The project would be considered to have significant effects if it would be substantially incompatible in scale, massing, facade patterns or materials with existing development; would substantially block public views of the Bay, hills, other public open space, or architectural landmarks from publicly accessible viewpoints; or would cause glare that could create a safety hazard for motorists.

Also as noted on p. 51 of the Draft EIR, judgments of compatibility in scale, massing and other design factors are, to some extent, subjective. It should also be noted that the analysis of visual effects is not limited to effects on historic buildings, but includes the project's effect on the entirety of the existing visual setting.

In achieving its full height at the north side and "funneling down" the building mass as it approaches the California State Building and the historic districts, the New State Office Building would reflect the existing pattern of decreasing building mass and increasing open space as the viewer approaches Civic Center Plaza, and would be intended to make the historic building the visual focal point of the state building complex. This transition occurs now for viewers moving from the Plaza towards Market Street, both horizontally, as buildings are placed closer to the street, and vertically, as building heights exceed those in the Civic Center.

The Draft EIR concludes that the visual effects of demolition of the existing Annex and construction of the proposed New State Office Building would not be significant because the new structure, while taller than the California State Building, would be a transitional element between the existing historic Civic Center buildings and the existing Philip Burton Federal Building, as stated on p. 51 of the Draft EIR. (The Federal Building, as part of the existing setting, cannot be ignored in assessing the project's impact, and the description of the proposed New State Office Building as transitional between two distinct types of development - the historic Civic Center and the modern Federal Building - is therefore not inaccurate or misleading, as stated by the commenter.)

Further, as stated in the Project Description, p. 22 of the Draft EIR, the New State Office Building would include materials and design features complementary to the California State Building, including white granite cladding and a three-story base with detailing that would serve as a continuation of the base of the historic structure.

The preparers of the Draft EIR reviewed visual quality and urban design effects in light of the multiple factors that make up the existing setting, and continue to judge that the proposed project would not be substantially incompatible in scale, massing, facade patterns or materials with existing development viewed as a whole. The project also would not substantially block public views of the Bay, hills, or other public open space, or of architectural resources in the Civic Center, and would not cause hazardous glare, as stated on pp. 53 and 60 of the Draft EIR. Therefore, the project would not have a significant adverse effect on Visual Quality or Urban Design.

Regarding conformance with existing land use plans and policies, the Draft EIR states on p. 43 that the proposed New State Office Building would exceed the height limit for the site in the San Francisco City Planning Code, and that this exceedence in itself would not be a physical, environmental impact and would not be a significant effect. (As noted on pp. 33-34 of the Draft EIR, the project would not be subject to local plans and codes.) Regarding the *San Francisco Master Plan*, the project also would not be subject to this Plan. However, as stated on p. 41, substantial non-responsiveness to the *Master Plan* would be considered a significant effect of the project. The Draft EIR concludes, on pp. 42-43, that the project as a whole (not the height and mass only, as stated by the commenter) would generally respond to the policies in the *San Francisco Master Plan*. It should be noted that, in the case of a project subject to review by the City of San Francisco, the City Planning Commission or Department of City Planning, in making a determination about project consistency with the *Master Plan*, must balance conflicting objectives and policies to achieve the project that, overall, best meets the goals of the *Master Plan*. Therefore, individual project elements may not respond to individual *Master Plan* policies, even in a project that is generally responsive to the *Master Plan*.

Regarding the specific policies noted by the commenter, Policy 2 of Objective 2 of the Draft *Civic Center Plan* ("Promote harmony in building heights in the larger Civic Center area and maintain the predominance of City Hall in the core area") is noted on p. 37 of the Draft EIR. The discussion below this policy in the Draft *Civic Center Plan* states that buildings fronting on Civic Center Plaza should not exceed 80 feet, that the City Hall dome should remain the predominant visual element within the Civic Center, and that increased height may be appropriate at the periphery of the core area, but that the height of the existing Federal Building should not serve as an acceptable norm. The proposed New State Office Building, at 209 feet along Golden Gate Avenue, would be near the edge of the Civic Center core area. As stated on p. 51 of the Draft EIR, "The design is intended to taper down the new building mass from the north, near the 300-ft.-tall Federal Building north of Golden Gate Avenue, to the south at the 80-ft.-tall California State Building and other buildings of the Civic Center." As stated above in the discussion of architectural resources, the New State Office Building would not detract from the relationship of core Civic Center buildings to City Hall. Therefore, the project would generally respond to Policy 2 of Objective 2.

Policy 3 of Objective 3 ("Ensure that new buildings are compatible with the architectural character of the Civic Center and incorporate major common design elements. Adhere to architectural design guidelines that build on the characteristics of the core Beaux Arts buildings") is also noted on p. 37 of the Draft EIR. The discussion below this policy in the Draft *Civic Center Plan* states that new development in the core area ("sites facing City Hall, fronting on Civic Center Plaza or Fulton Street") should complement the Beaux Arts composition of the Civic Center and be compatible with the established neo-classical architecture of core buildings, including City Hall, the California State Building and others. The text of the Draft *Civic Center Plan* states that buildings on other sites should be compatible in design but need not adhere as closely to height, massing, setbacks, facade design, ornamentation and materials, and that those buildings visible from Civic Center Plaza should not compete with nor distract from the architectural character of the core buildings. The proposed New State Office Building would be taller than the core buildings, including the California State Building (with the exception of the City Hall dome). As stated on p. 51 of the Draft EIR, the new building would be intended to complement, with a contemporary design, the existing materials and character of older, Beaux Arts-style Civic Center buildings, including the California State Building. Therefore, the project would generally respond to Policy 3 of Objective 3.

It should be noted, as described in the Draft EIR on pp. 7 and 22, that the proposed New State Office Building would consist of four vertical elements ranging in height from 11 to 16 stories (not 13 to 16 stories, as stated by the commenter).

- C-2) The design-build proposal that is the subject of the Draft EIR is a preliminary design. Therefore, ongoing consultation with the State Historic Preservation Officer (SHPO) was identified as a mitigation measure in the Draft EIR (Measures E.1.d and E.1.e). In the comment letter, the SHPO states that "an explicit and specific reporting and monitoring program should be adopted as part of the findings of the lead agency." As noted by the commenter, CEQA Sec. 21081.6(a) requires adoption of a mitigation monitoring program as part of the project approval process. This document will be prepared separately from the EIR. Specifically, that reporting and monitoring program could include, but would not necessarily be limited to, the following items. The final review and monitoring program relating to Mitigation Measures E.1 through E.4 would be subject to an understanding between the design-build team, the Office of Project Development and Management (OPDM), and the SHPO.

- A. The HSH design-build team and OPDM would meet with the SHPO prior to the start of the formal schematic design stage and determine a schedule for meetings with the SHPO during design and construction, and for the submissions of drawings to the SHPO throughout design.
 - B. As part of the initial meeting between HSH, OPDM and the SHPO, the types of drawings and the intervals of those drawings to be submitted by HSH to the SHPO for review would be established. This process would assure that conceptual approaches and resulting designs would have minimal impacts, and that construction documents contain appropriate details and specifications.
 - C. A time period would be mutually agreed upon as the period for review of submitted drawings and documents.
 - D. The submissions at the schematic and design development phases would clearly show existing features that are historically significant, features proposed to be altered, features proposed to be removed, and new features.
- C-3) Both Alternative 2 (13 stories and 180 feet) and Alternative 3 (9 stories and 130 feet) would have lesser visual impacts on the Civic Center than would the 16-story, 209-foot project, as stated in the Draft EIR on pp. 224 and 227, respectively. As stated in the response to Comment C-1, above, the principal defining factor of the historic districts is the relationship of the major historic buildings to City Hall. Therefore, neither Alternative 2 nor Alternative 3 would have substantially different effects on the historic districts than would the proposed project.
- C-4) The Draft EIR states, on pp. 231-232, that the 24-inch-wide moat required as part of the base isolation scheme of Alternative 4 would be a new visual element that would adversely affect the exterior of the California State Building. This analysis is by way of comparison to the proposed project, which would not include base isolation and therefore would not include a moat. The Draft EIR does not conclude that installation of the moat would be a significant effect, but rather that the moat would result in an adverse effect that would not occur as part of the project.

DEPARTMENT OF GENERAL SERVICES

STATE HISTORICAL BUILDING SAFETY BOARD

400 P STREET, 5TH FLOOR, SACRAMENTO, CA 95814

(916) 445-7627 • FAX 327-3371



December 7, 1994

TO: State of California
Office of Project Development and Management
Attention: Christal Waters
400 R Street, Suite 5100
Sacramento, CA 95814

SUBJECT: **Draft EIR - San Francisco Civic Center Complex**

The State Historical Building Safety Board has limited itself to review of those issues related to the effect of the Project on cultural resources, recognizing that the site, the building exterior and its interior all fall into this category. More specifically, under Section III, E, "Cultural Resources", our concern focuses on Impacts E.1, E.2 and E.3 and their mitigation.

E.1. Some time ago, discussions were held with Project staff and SHBSB staff regarding the degree of intrusiveness of seismic work vis-a-vis the latitude available under California's Historical Building Code (SHBC). The discussion was similar to ones held with OES and FEMA regarding the intent of the governing SHBC. It must be recognized that, while the SHBC is a call for making the least intrusive modifications necessary to retain the viability of historic resources, a justifiable case can readily be made that, when addressing seismic stability, this is not a call for the barest minimum of work, but rather a call for the most prudent balance of intrusion that will effect the highest reasonable level of protection against significant damage or loss of the historic resource. The foregoing was the precise basis for the SHBSB's "buy-out" on what is clearly a significant level of intrusion on historic rooms, etc., as opposed to SHBC or MAEPO minimums. D-1

E.2. The renovation, restoration, repair and/or replacement of historic features is acknowledged to be a "not significant" effect of this project. However, in the discussion following this item, it would be appropriate to point out that invoking the governing Historical Building Code will be likely to facilitate this work and contribute to its cost-effectiveness.

E.3. This statement acknowledges the potentially significant effect of integrating life safety, access and environmental upgrades. Mitigation E.3.b addresses significant "components that must be disturbed for the incorporation of code-driven...retrofits." This is precisely the area of rehabilitation for which the SHBC is most useful: invoking the SHBC can almost guarantee a diminishment of significant effects. Yet the governing SHBC is omitted from the discussion.

Apart from the almost incidental reference to the SHBC under Mitigation E.1.b, no other reference has been found in this document to the code which governs this historic resource and which is recognized by many professionals as the most important preservation tool in California's inventory. Moreover, by statute, state agencies are directed to utilize the SHBC, and the Governor's Executive order W-26-92, reinforces this mandate. Even more explicit is the language of Health and Safety Code 16600, Seismic Retrofit Guidelines for State Buildings (cited in my letter to you of February 18, 1994), which states in paragraph (d): "Building seismic retrofit guidelines shall be consistent with the State Historical Building Code and shall include provisions for the preservation of historical buildings."

D-1
cont'd.

The SHBSB believes that the referenced Environmental Document cannot meet its obligation to research, evaluate and instruct, without acknowledging the statutory relationship between this major historic resource and the Historical Building Code. At the very least, this reference should appear in the "Cultural Resources" Section, perhaps most aptly at the top of page 84, where the mandates of PRC 5024 and the Executive Order are listed: and again, in the "Summary", most appropriately near the bottom of page S-8 where it can be referenced along with the already-cited "Secretary of the Interior's Standards".

Please contact the undersigned if there are any questions.



Robert E. Mackensen, AIA
Executive Director

REM:cg

cc: Fred Hummel, DSA
Office of Historic Preservation
SHBSB Executive Committee

Letter D - Robert E. Mackensen, AIA, Executive Director, State Historical Building Safety Board, December 7, 1994

- D-1) Comment noted. The statutory relationship between the renovation of the California State Building and the State Historical Building Code (SHBC) is acknowledged by the project sponsors and the project design team, and, as Part 8 of Title 24 of the California Code of Regulations, the SHBC would be used in the project. Ongoing review of the project by the State Historic Preservation Officer is the recommended mechanism for ensuring that historic resources in the California State Building are minimally affected and that the SHBC is used to maximum benefit. Please see also the response to Comment C-2, p. 55 of this document. The project would also be presented to the State Historical Building Safety Board (SHBSB) at appropriate times during design development.

During the development of the Design Guidelines, SHBSB and OPDM staff discussed the seismic safety performance standards that should be used to protect the California State Building, to allow connection of that building and the proposed New State Office Building, and to ensure the project can obtain bond funding. (As noted the Draft EIR, page 114, and in response to Comment B-4, p. 42 of this document, buildings funded by lease revenue bonds must provide assurance that the building will continue to be able to meet bond payments throughout the bond payback period. To meet these payments, the building must be continually occupiable in order to charge the rent which supports the bond payments.) SHBSB and OPDM staff concurred that, in order to provide the seismic retrofit needed to support the Courts' program, which requires connection to the New State Office Building, and to meet bond funding assurances, it would be appropriate to have the building meet the seismic safety standards required for new construction, as opposed to those under the Minimal Acceptable Earthquake Performance Objectives (MAEPO). While these standards require more structural support for the California State Building, resulting in a higher potential for intrusion into significant interior space, the overall consolidation of the two buildings would better withstand seismic activity. The project managers would work closely with the State Office of Historic Preservation and the SHBSB to ensure that the rehabilitation's effect on significant features is minimal.

The Draft EIR acknowledges, in Impact E.1, p. 103, that seismic retrofitting of the building would be a potentially significant effect of the project. Mitigation Measures E.1.a, E.1.d, and E.1.e, pp. 113-115, would reduce this impact to a less-than-significant level.

Please see Chapter II, Revisions to the Draft EIR, for revisions to p. S-8, p. 84, p. 109, and p. 116 of the Draft EIR text to add discussion of the State Historical Building Code.



United States Department of the Interior

RECEIVED
PROJECT DEVELOPMENT
MANAGEMENT

NATIONAL PARK SERVICE
Western Region
600 Harrison Street, Suite 600
San Francisco, California 94107-1372

Dec 15 3 53 PM '94

IN REPLY REFER TO

H30(WR-RRP)

December 15, 1994

Ms. Christal Waters
Office of Project Development and Management
Department of General Services
400 R Street, Suite 5100
Sacramento, California 95814

Re: Draft Environmental Impact Report for the State of California San Francisco Civic Center Complex

Dear Ms. Waters:

We have reviewed the above-referenced document to assess the proposed project's effects on the San Francisco Civic Center National Historic Landmark District and on the State Building at 350 McAllister Street, a contributing resource within the National Historic Landmark. The San Francisco Civic Center Historic District was designated a National Historic Landmark on February 27, 1987. National Historic Landmark status is the highest honorary designation that can be conferred upon a historical property. The National Park Service is charged with monitoring the condition of National Historic Landmarks and providing preservation assistance to their owners and interested parties.

Although it is our understanding that this project is not subject to the City of San Francisco's planning and zoning requirements, there are elements of several City plans that govern development within the Civic Center. The Urban Design element of the *San Francisco Master Plan* contains several objectives and policies that relate to our comments on the proposed project. Objective 1 (Policy 3), states that "buildings, when seen together, produce a total effect that characterizes the city and its districts." Objective 2, has as its goals to "preserve notable landmarks and areas of historic, architectural or aesthetic value" (Policy 4); to "respect the character of older development nearby in the design of new buildings" (Policy 6); and to "recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character" (Policy 7). Finally, Objective 3 addresses "moderation of major new development to complement the city pattern, the resources to be conserved and the neighborhood environment." Policies 1, 2, 3, and 5 relate to the proposed Civic Center project.

E-1

The San Francisco Planning Department's draft *Civic Center Study*, prepared in October 1994, provides design and other guidelines for the Civic Center area. The objectives of the Architectural and Urban Design element of the draft *Civic Center Study* are to "preserve and strengthen the urban form of the Civic Center

E-2

to enhance its importance as the central place of government and a major cultural center in San Francisco" (Objective 2); and to "preserve and enhance the design of buildings and their spatial relationship within the Civic Center" (Objective 3).

E-2
cont'd.

The four alternatives proposed in the Draft Environmental Impact Report (DEIR) do not conform with the objectives and policies of the *San Francisco Master Plan* or the draft *Civic Center Study*. Our comments on the proposed development are stated in terms of the objectives and policies set forth in the "Civic Center Study"; however relevant portions of the San Francisco Master Plan also apply.

Objective 2 of the *Civic Center Study* calls for protection of the view corridors to the Civic Center and City Hall and promoting harmony of building heights in the larger Civic Center area. The Visual Effects and Cultural Resources sections of the DEIR do not explore the effects of a new 16-story building (or 13- or 9-story building) on the historic character of the 350 McAllister Building or the Civic Center Historic District. The DEIR minimizes the effect of the new construction on the site and on the historic district as a whole.

All of the alternatives proposed for the 455 Golden Gate site exceed the City's suggested 80' height limit for that site. All alternatives would introduce an intrusive element into the district, intensifying the adverse impact of the existing buildings that exceed the recommended Civic Center height limits (i.e., the Federal Building, Fox Plaza, and CSAA Building). The proposed 16-story building could represent the beginning of the "walling in" of the Civic Center Historic District, should additional high-rise construction occur on other lots open to development within the Civic Center. The existing buildings that do not respect the height of the district stand at least one block or more from the core of the Civic Center Historic District. The Federal Building currently forms a backdrop to the north side of the historic Civic Center. With the State Annex at 455 Golden Gate, added to the width of Golden Gate Avenue and the Federal Building plaza, the Federal Building itself is separated from the core of the Civic Center District by a full block. The proposed building, in contrast, would bring visual closure to the north side of the historic district by abutting its imposing height to within a half-block of Civic Center Plaza. The new State Building, by its sheer bulk, would overwhelm the historic building at 350 McAllister. The massing of the proposed building, while "screening" the more visually intrusive Federal Building, would in effect introduce a new and more immediate intrusion into the historic district. The DEIR appears to justify the height and location of the new building as a "screen" for the Federal Building. However, a trend toward high-rise construction in and around the historic district should not be continued simply because the newer project may be better designed than earlier developments.

E-3

Objective 3 (Policy 3) seeks to ensure that new buildings are compatible with the architectural character of the Civic Center. The location of the proposed new building, directly adjacent to the historic State building, is a very visible and prominent site in the core of the historic Civic Center. The height, massing, and materials of the proposed new construction are not in harmony with the adjacent State building or the character of the historic Civic Center. The proposed design does not appear to take many design elements, other than cladding, from the nearby historic buildings, and therefore adds a further visual intrusion to the district.

Objective 3 (Policy 4) calls for preservation of historic Civic Center buildings in accordance with nationally and locally established standards. We are pleased that the DEIR stresses the restoration of the exterior of 350 McAllister. Impacts to significant historic fabric on the interior, however, will be extensive. Interior alterations are designed both for seismic strengthening and proposed new uses of the building. The DEIR states that damage and destruction of historic fabric will be minimized to the extent possible and calls for removal and reinstallation of historic fabric in significant areas. New uses of the building and seismic strengthening work should be carefully considered and designed so as to minimize the amount of intervention into the significant features and spaces of the building. Conformance of all work with the Secretary of the Interior's "Standards for the Treatment of Historic Properties" and close consultation with the State Historic Preservation Officer should be emphasized.

E-4

The DEIR does not discuss the current condition of the Annex building at 455 Golden Gate or propose its rehabilitation and reuse. This alternative should be explored, in combination with rehabilitation of 525 Golden Gate, and new construction on the Hastings site.

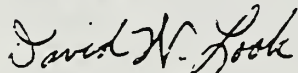
E-5

The DEIR rules out use of 150 Oak Street and the Central Freeway properties because they lie outside the Civic Center. Both properties, however, are adjacent to the Civic Center and near other State office buildings. Use of these properties should be considered more seriously as alternative sites.

E-6

We appreciate the opportunity to comment on this document. If you have any questions regarding our comments, please contact Ann Huston or Michael Crowe at (415) 744-3988.

Sincerely,



David W. Look
Chief, Preservation Assistance Branch
Division of National Register Programs

cc:

Steade Craigo, CA SHPO
Vincent Marsh, San Francisco Landmarks Board, 1660 Mission St., San Francisco,
CA 94103

Letter E - David W. Look, Chief, Preservation Assistance Branch, Division of National Register Programs, National Park Service (Western Region), U.S. Department of the Interior, December 15, 1994

- E-1) Comment noted. The *San Francisco Master Plan* Objectives and Policies noted by the commenter are included in the Draft EIR on pp. 34-35.
- E-2) Comment noted. The Draft *Civic Center Study*, cited by the commenter, was released as a "Draft for Citizen Review" at the time the Draft EIR went to press. The Objectives noted by the commenter are included in the Draft EIR on pp. 37-38. However, the Draft EIR incompletely quoted Objective 3. Please see Chapter II, Revisions to the Draft EIR, for a correction to p. 37 regarding the language of Objective 3.
- E-3) Please see the response to Comment C-1, p. 48 of this document, for a discussion of the project's effects on visual and architectural resources, and in particular the discussion of plans and policies beginning on p. 54, for a discussion of the project relative to Objective 2 and Policy 3 of Objective 3 of the Draft *Civic Center Study*.
- E-4) The Draft EIR acknowledges, in Impact E.1, p. 103, and Impact E.3, p. 103, that interior alterations of the California State Building would result in potentially significant effects of the project. Mitigation Measures E.1.a, E.1.d, and E.1.e, pp. 113-115, and E.3.a, E.3.b, and E.3.c, p. 116, are identified to reduce these impacts to a less than significant level. Measure E.1.a calls for using the Secretary of the Interior's Standards, and Measure E.1.d, E.1.e, and E.3.c call for consultation with the State Historic Preservation Officer. Please see also the responses to Comments B-4 and D-1, pp. 42 and 59, respectively, of this document, for additional information on the proposed seismic upgrade of the California State Building.
- Please see also Comment D-1 (from the State Historical Building Safety Board), which further describes the rationale for the proposed level of seismic upgrade. Please see also the response to Comment C-2, p. 55 of this document, for additional discussion of proposed consultation with the State Historic Preservation Officer.
- E-5) The existing 455 Golden Gate Avenue building, unlike the California State Building at 350 McAllister Street and the vacant state building at 525 Golden Gate Avenue, was not vacated following the 1989 Loma Prieta earthquake and remained in service as a state

office building, as described on p. 5 of the Draft EIR. Continued use of the 455 Golden Gate Avenue building for state offices, even with re-occupancy of the 525 Golden Gate Avenue building, would provide only about 55 percent of the program square footage of 1,053,000 gross sq. ft. and would thus preclude the realization of key project objectives, described on Draft EIR p. 3, including:

- Consolidate San Francisco general state office space in the Civic Center;
- Maximize the number of state offices housed in state-owned buildings to ensure that the significant long-term savings from the occupancy of owned buildings accrues to the state; and
- Ensure that the full value of the state's real estate assets are realized through programs for the intensification of development on appropriate lands or the disposition of surplus lands, or both.

Therefore, retention of the existing 455 Golden Gate Avenue building is not considered a feasible alternative that would meet project objectives.

Regarding the reuse of 525 Golden Gate Avenue, please see the Supplemental Analysis of Alternative 2, p. 5 of this document.

- E-6) The State of California agreed to sell the 150 Oak Street building to two independent schools in 1994. The sale is in escrow, and those schools are planning to occupy the building by September 1997. Therefore, 150 Oak Street is no longer available for any future consideration as a feasible project alternative. Regarding the Central Freeway properties, as noted on p. 234 of the Draft EIR, use of those properties would not meet project objectives of consolidating state offices and would preclude disposition of surplus state property, thus not providing a cost-effective solution to the state's office needs. As described in the Department of General Services' 1992 *San Francisco / Oakland State Facilities Plan*, a building that could be constructed on the block bounded by Franklin, Turk and Gough Streets and Golden Gate Avenue would be U-shaped and therefore inefficient; a second building would be constructed on the eastern portion of the block bounded by Golden Gate Avenue and Gough, McAllister and Franklin Streets. Also, as described in reference to the 525 Golden Gate Avenue building in the Supplemental Analysis of Alternative 2, p. 5 of this document, operating costs for several smaller buildings would be greater per square foot than for one large building due to additional elevators, separate heating, ventilation and air conditioning and other

building systems, more entry points where security is required and more lobby and circulation space relative to total office space.

As further noted on p. 234 of the Draft EIR, state legislation requires Caltrans, which owns the Central Freeway properties, to consult with the City of San Francisco prior to disposing of the properties. Because the City has not approved a plan for the area, use of the Central Freeway properties could substantially delay the project. Finally, as stated on p. 234, while the Central Freeway properties are adjacent to the Civic Center, this alternative would not meet the statutory requirement to locate the new state offices *in* the Civic Center.



**City and County of San Francisco
The Planning Department**

**1660 Mission Street
San Francisco, CA 94103-2414**

December 19, 1994

Mr. Kevin Kaestner, Project Director
State of California Department of General Services
Office of Project Development and Management
400 R Street, Suite 5100
Sacramento, CA 95814

RE: Project No. OPDM 0457: State of California, San Francisco Civic
Center Office Building.

Dear Mr. Kaestner:

The Planning Department and Planning Commission appreciate your Department's close cooperation with the City in the selection process for the design/build team for the new State Office Building. We understand that the details of the proposed building design are still preliminary and can be amended to respond to local urban design, land use and environmental concerns.

The Department has reviewed the design of the proposed State office building and the Draft Environmental Impact Report (DEIR) and we would like to share our comments and views with you on the Project at this early stage of the project design. We have particular concerns about wind effects along Polk and Larkin Streets and along Golden Gate Avenue. These concerns are addressed in a separate, attached, letter to Ms. Christal Waters describing our comments on the DEIR. Our land use and design comments are listed below by general topic.

1. Concentration of Government Activities within the Civic Center. The Civic Center Plan encourages the concentration of government administrative activity within the Civic Center. The City is pleased that the State government is consolidating its administrative and judicial activities within the Civic Center. The proposed Civic Center Plan seeks to:

"Maintain and reinforce the Civic Center as the symbolic and ceremonial focus for the administrative and civil judicial functions of the City, State and Federal Governments, and as a focal point for cultural, ceremonial and political activities" [Objective 1];

"Promote the efficiency and convenience of governmental agencies by locating government legislative, administrative and permit functions within the Civic Center" [Objective 1, Policy 1]

2. Pedestrian-Interest Activities. The City envisions a *safe, dynamic and pleasant 24-hour campus of the Civic Center* and its environs and seeks to locate a variety of diverse daytime and nighttime activities within the area. Of particular interest is the presence of visually-interesting and pedestrian-interactive uses at ground floor level of buildings, both private and public.

ADMINISTRATION
(415) 558-6414

CITY PLANNING COMMISSION
(415) 558-6414

PLANS AND PROGRAMS
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IMPLEMENTATION/ZONING
(415) 558-6377

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FAX: 558-6426

Objective 1, Policy 8 of the 1994 proposed Civic Center Plan states:

"Encourage visual interest for pedestrian-interactive ground floor uses within existing historic buildings and in new buildings within the core area. In adaptive reuse of historic buildings, encourage the location of pedestrian-active uses on the ground floor, such as food service spaces, permit filing or records centers, government bookstores or other high volume activities. New buildings should be designed to promote pedestrian safety, interest and comfort."

The Department is concerned with the design of the Golden Gate Avenue facade and the Polk and Larkin Street facades.

Golden Gate Avenue Facade.

The Department is concerned with the "visual impact" of having a 22 feet wide canopy, 50 feet high overhanging city streets. The width of this element should be kept to a minimum as should its height, say 10 to 12 feet wide at a 15 to 20 feet height. Other design approaches should be examined to mitigate wind impacts such as bay windows, decorative balconies, etc..

The arcade setback along Golden Gate Avenue does not induce the kind of pedestrian-interaction that the City envisions for the Civic Center. Setbacks at the property line are traditional Beaux Arts elements which create impressions of grandeur and formality. This should be maintained with historic buildings. New buildings, however, should be designed to maximize pedestrian interaction with uses within the building as well as visual interest. Our experience with arcades over the past twenty years leads us to conclude that arcades should be discouraged. Arcades tend to be dark, disconnect pedestrians from activities within the building, and often channel wind resulting in an unpleasant "wind tunnel" within the arcade. We recommend that the facade along Golden Gate Avenue be built to the property line with large, well-lit fenestration and high volume activities within the ground floor spaces. You may also consider defining this space as an enclosed gallery that one can walk through during business hours.

Polk and Larkin Street Facades. The Department is concerned with the design at the pedestrian/street wall level, landscape treatments, and sidewalk/curb cuts along the Polk and Larkin Street facades. The sidewalk should be continuous with dropped curbs where needed. Landscape treatment should be pedestrian-friendly and visually interesting and should be well-lit at night to avoid dark nooks and crannies. Facade design and detailing at the pedestrian level (building base) should be visually engaging, rich in detail, texture and surface relief.

3. **Sharing of Facilities.** One of the goals of the Civic Center Study is to maximize the sharing of public resources and facilities in order to reduce competing or overlapping land use functions (eg. too many underused law libraries, cafeterias, parking garages) and the public funds required to support and maintain them.

F-2
cont'd.

F-3

The Project Sponsor is urged to design the following Project land use activities to maximize their public use, particularly after normal working hours.

Public Access to Facilities. Public meeting rooms, auditorium, rest rooms and other public spaces should have direct access to the street. Community groups should be encouraged to use/lease these spaces after business hours.

Project Child Care Center. The Project child care facility may be more appropriately located on the Hastings College block. This location presents the opportunity to develop a truly first class facility that could serve the child care needs of Hastings College students and faculty and State, Federal and City employees. The San Francisco Unified School District is considering the construction of an elementary school at that site which could well include a child care facility. We encourage cooperation between the State and the Unified School District to develop a child care facility that could serve Project employees and clients as well as the local community.

Project Cafeteria. There are seven cafeterias located within government buildings within the Civic Center and with one located within the private Triple A building on Van Ness Avenue. The State PUC Building at 505 Van Ness Avenue features a modern cafeteria which has substantial excess capacity and did so at the time of the survey, prior to the relocation of 450 McAllister Street tenants. It does not seem prudent to build another cafeteria within one block of an existing State cafeteria which is underused. Notwithstanding this duplication of resources, the 7,400 sq. ft. cafeteria/kitchen proposed for the Project could, perhaps, be better utilized as office space or expansion space for the courts. A cafeteria within the building could have an adverse impact on the land uses within the vicinity as the 925 current employees may use the cafeteria facility rather than the existing PUC cafeteria or the numerous local cafes and restaurants within the vicinity. A number of local businesses could go out of business by the development of a Project cafeteria, the market demand for which has not been demonstrated. Please analyze the potential land use impacts on existing food services businesses in the area should the Project cafeteria be developed.

F-3
cont'd.

Law Libraries. Minimize Project law libraries containing hard copy volumes and replace this function with electronic access to law books and references for each judge and clerk. Chambers and clerks offices should be equipped with personal computer terminals and printers to facilitate use of electronic law library networks.

Court-Related Detention Facilities. Will the Court facilities provide detention facilities for incarcerated defendants? Will these facilities provide sleeping quarters? The Federal Courts across the street at 450 Golden Gate Avenue transport incarcerated defendants at great expense from Federal detention facilities in Pleasanton, CA. In hindsight, they state that they should have provided detention facilities with sleeping quarters in the building or within the vicinity for up to 20 incarcerated defendants. In foresight, would it be prudent to provide such facilities for the State Courts? This would reduce traffic and air quality impacts of transporting incarcerated defendants as well as the great expense of sworn deputies required to transport

them hours to and from the detention facilities. Perhaps the State could provide these facilities within the Project and share them, on a contract basis, with the Federal Courts.

F-3
cont'd

4. **Mitigation Monitoring.** What type of monitoring program will the State provide to the City of San Francisco that the tenant agencies within the Project will comply with the State-required transportation management program? Who monitors the agencies' efforts? Will the State Transportation Demand Management (TDM) Program manager report to the City's TDM manager?

F-4

5. **Cumulative Housing Impacts.** The demand for 650 housing units that would be indirectly created by the net new office space to the City is a concern. We encourage the State to work with the City to develop additional housing in San Francisco, particularly on State-owned lots recently cleared in the Hayes Valley neighborhood.

F-5

6. **Planning Commission Comments.** The City Planning Commission offered the following comments on the Project design at the November 10, 1994 informational presentation public hearing on the Project.

Shadow Impacts. There is concern of the shadow impacts on Turk, Elm and Van Ness Avenue [Commissioner Prowler].

F-6

Visual Transition. There is concern that there be a clear visual transition between the new and old State Buildings and of how the new building relates to existing view lines [Commissioner Fung]. There is concern with how the Golden Gate Avenue facade lacked differentiation and "looked like a box" [Commissioner Prowler]. There is concern that the sidewalk was too narrow and there is a need for more trees to soften the visual effects of the new building [Commissioner Levine].

F-7

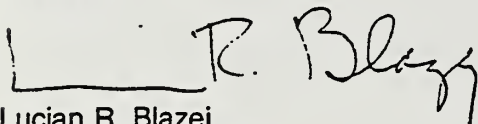
Employment. There is concern that there will be no net new employment for the City. It was posed that the massive new building was a "high price to pay" for no new employment opportunities.

F-8

Mr. Kevin Kaestner
Planning Department Comments on State Office Building Design, OPDM 0457
December 19, 1994

The Department appreciates your cooperation in the design of this important project and we look forward to meeting with you in the very near future to discuss these concerns. If you have any questions, please feel free to call me or planner Susana Montaña at 558-6313.

Sincerely,

A handwritten signature in dark ink, appearing to read "L. R. Blazej". The signature is written in a cursive, somewhat stylized font. The first part of the signature, "L. R.", is written in a more formal, blocky style, while "Blazej" is more fluid and cursive.

Lucian R. Blazej
Director of Planning

cc: Susana Montaña
Barbara Sahm
Christal Waters
Civic Design Committee of the San Francisco Art Commission

Attachment: Comments on the State Office Building DEIR

Letter F - Lucian R. Blazej, Director of Planning, San Francisco Planning Department,
December 19, 1994

- F-1) Comment noted. Objective 1 of the draft *Civic Center Plan*, cited by the commenter, is quoted in the Draft EIR on pp. 37-38. While Policy 1 of Objective 1 is not quoted in the Draft EIR, the Draft EIR does include similar policies in the adopted Civic Center Area Plan (see p. 36 of the Draft EIR). It should be noted that two of the project objectives (see Draft EIR pp. 2-3) address maintaining state offices in the Civic Center.
- F-2) Comment noted. See Chapter II, Revisions to the Draft EIR, for addition of Policy 8 of Objective 1 to p. 38 the Draft EIR text and for an addition to p. 43 to briefly describe the project's relationship to Policy 8.

The discussion accompanying Policy 8 in the draft *Civic Center Plan* states:

The Beaux Arts style buildings were designed to inspire awe in the visitor. They are, indeed, elegant, awesome and formidable. Buildings feature grand entrances with elevation changes which emphasize a sense of grandeur. As intended, these design elements may trigger a human response of humility when entering these special places. Presently, the same buildings that delight and awe the visitor by day, may frighten them at night. Fortress-like openings, landscaped setbacks and metal grill work cast formidable shadows. Measures promoting a feeling of safety should be developed and implemented. As an example, lighting could be installed on existing historic buildings to emphasize elegant ornamentation and to illuminate "nooks and crannies." New buildings should be designed to maximize visual interaction between ground floor uses and the pedestrian.

The proposed New State Office Building would respond to the concerns underlying Policy 8. The building would include a major public entrance, as described on p. 22 of the Draft EIR. Also as described on p. 22, the Golden Gate Avenue entrance would be at a different level than the main entrance of the California State Building on McAllister Street; the New State Office Building entrance would include stairs up from Golden Gate Avenue, as shown in Figure 6, Draft EIR p. 12. Because of the grade change between Golden Gate Avenue and the building's second level, the proposed entrance arcade would include ramps that could serve pedestrians as well as disabled persons.

According to the project design-build team, the proposed canopy is included as part of the project primarily as a means of reducing winds on the sidewalk in front of the building. The canopy would also address several issues identified in the draft *Civic*

Center Plan. The design-build team states that the canopy, at 22 feet in width and about three stories above the street, would define "the sense of a 'contained public space.'"

The proposed canopy will be constructed of transparent glass, translucent glass and metal. It will allow daylight to pass through to the sidewalk during the day, and with the arcade will be dramatically lit up during the evening to establish a secure, well-lit public space along Golden Gate.²

According to the project design-build team, the proposed arcade is also intended as a wind-reduction measure. It should be noted that an arcade such as is proposed generally does serve to protect pedestrians using the arcade from wind and rain. In addition to wind reduction, the arcade, which has been more accurately defined by the project design-build team as a public portico, would also serve as a grand entrance to the building from the Golden Gate Avenue side. The New State Office Building would not be a commercial or retail building, but a public government building, and the desire of the state is to have the Golden Gate Avenue entry reflect the important public function of the building. Contrary to the commenter's assertion, the arcade would not be dark, would not disconnect pedestrians from activities within the building, and would not be expected to channel winds along the building. The "roof" of the arcade would be two stories high, ending approximately one story below the canopy. This height would allow light to enter the arcade during the daylight hours, and the arcade itself would also be well-lit at night, to promote a sense of security to pedestrians. During design development, the use of the arcade walls will be considered as a means for engaging pedestrian interest, possibly through art works. The arcade, in addition to providing disabled access to the Golden Gate Avenue entry, is also intended to effectively widen the sidewalk along Golden Gate Avenue by allowing building users to move off the sidewalk and into the arcade, freeing the sidewalk for passers-by.

In view of the above, the Golden Gate Avenue facade would promote pedestrian safety and comfort by minimizing ground-level winds and providing adequate lighting, as called for in Objective 1, Policy 8 of the proposed Civic Center Plan.

As shown in Figure 9, p. 15 of the Draft EIR, Level 2 of the proposed New State Office Building, which essentially would be the street level along Golden Gate Avenue, would

² Hartman, Craig W., AIA, Skidmore Owings & Merrill, letter to Art Thompson, Hines Interests Limited Partnership, January 19, 1995.

house offices of the Department of Industrial Relations and the Board of Equalization. Along with the Franchise Tax Board, these offices would be expected to attract the most visitors to the building and would therefore be relatively pedestrian-interactive, as called for in Policy 8. The project cafeteria, which would be open to the public, also would be on Level 2.

Regarding the visual effects of the proposed canopy, the Draft EIR did not conclude that the canopy would be substantially incompatible with existing development, and thus did not conclude that the canopy would have a significant effect on visual quality.

Regarding inclusion of the canopy in the project design, as stated on Draft EIR p. 74, the results of the first-phase wind-tunnel testing were provided to the design-build teams for use in development of building designs. As stated above, the design-build team indicates that the canopy was included in the project design primarily as a means of moderating ground-level winds along the Golden Gate Avenue sidewalk. Wind-tunnel testing of the proposed project confirmed that the canopy would reduce ground-level winds on the north side of the building.

Regarding the Polk and Larkin Street facades, the comment addresses the project design, and not the adequacy of the EIR. The following is provided for information. The design-build team has indicated that the following refinements could be made to the Golden Gate Avenue facade and Polk and Larkin Street Facades of the proposed New State Office Building. These changes would be relatively minor, and would not affect the Draft EIR's conclusion that effects related to visual and design factors would not be significant.

The "classical organization" of the building into a base, middle and top could be emphasized by greater articulation of the base that would visually link the new building to the historic California State Building, and by the introduction of a cornice at Level 14, which would reduce the apparent height of the building by two stories when viewed from pedestrian level on Golden Gate Avenue.

The "centrality" of the New State Office Building main entrance on Golden Gate Avenue could be accentuated, in keeping with style of the grand entrances on the California State Building and other historic buildings in the Civic Center.

The "visual density" of the facades could be increased through the addition of additional granite and/or pre-cast concrete cladding.

These or similar refinements would be made if, in the opinion of the San Francisco State Building Authority, or Authority staff, as appropriate, they prove beneficial and feasible during design development.

- F-3) The comment addresses the project design, and not the adequacy of the Draft EIR. The following is provided for information. Regarding Public Access to Facilities, Department of General Services policy gives priority to state agencies in the use of conference rooms and the auditorium. Public use of the meeting rooms in state buildings is not specifically authorized or prohibited, and City and other public interest groups have used the conference rooms in the existing facility. Currently, there is no specified direction on whether rooms in the New State Office Building would be available for use after hours. The Department of General Services would consider after-hours public use of the building, consistent with cost recovery, building security, and the safety of the building occupants.

Regarding the proposed Child Care Center, the state is investigating the opportunity for sharing child care space with the City of San Francisco and the San Francisco Unified School District. This shared child care site could be on the now vacant so-called Hastings site across Larkin Street from the project site, or at some other unidentified site nearby. The proposed project design includes child care space and will continue to do so until there is commitment to a shared facility.

Regarding the Cafeteria proposed as part of the project, cafeterias are included in the building as a requirement of state law and for the convenience for state employees and visitors for coffee breaks, and for lunches. State Welfare and Institution Code Sec. 19627 requires the Department of General Services to include a site for vending facilities to be operated by the Department of Rehabilitation's Blind Enterprise Program, where such vending facilities are feasible. In analyzing feasibility, the Departments of Rehabilitation and General Services must consider, among other things, the number of state employees in the building, the size of the building, and the length of time the property will be occupied by the state. Based on these requirements, and in consultation with the Blind Enterprise Program, the Department of General Services required the design-build team to include as part of the project an 8,000-sq. ft. cafeteria/kitchen. The

design-build team has included a 7,240-sq. ft. cafeteria/kitchen, with outdoor dining space making up the remainder of the requirement.³

With lunch time limited to one hour (and in the case of some flex-time employees, one-half hour), many employees do not have the time to go off-site for lunch, or to go off-site to order lunch "to go" and eat it before returning to duty. The cafeteria offers the opportunity for a quick lunch and coffee-break on-site.

Finally, whether to lunch on-site or off-site is an individual's choice. With the number and variety of restaurants in the area, many employees and visitors would elect to "eat out" at lunch, rather than consume the more standard fare offered at the employee's cafeteria. The state does not believe that having an on-site cafeteria would cause restaurants in the vicinity to go out of business.

Regarding the proposed Law Libraries, both the Supreme Court and Court of Appeal use computers for accessing legal data on file. However, computer-accessible information on CD ROM (compact disk - read-only memory) format is coming into use slowly, and not all back reference material will be available on that format. The preference now is to use printed reference material. The Supreme Court and Court of Appeal require secured library space for use by their staffs; these security requirements would preclude sharing their law libraries with other state departments or opening the libraries to public use.

Other departments that would occupy the project also have small law libraries and consideration would be given during space programming to determining the extent to which these libraries could be shared. With these other departments, the opportunity for space savings through shared library space for printed volumes may be somewhat reduced because the cost of operating shared space would have to be allocated fairly among the separate departments. In addition, to the extent that the individual departments rely on different statutes contained in different code books, there would be no concomitant reduction in storage space. Where departments do use the same court case books, duplicate copies of these volumes could be required to meet the potential demand for the same volume at the same time. Regarding use of electronic libraries and reference material for the other departments housed in the project, this is a function of

³ Bohmer, Guy, California Department of Rehabilitation, telephone conversation with Christal Waters, Department of General Services, February 8, 1995.

the department's individual budget allocation. During detailed space programming, the design-build team would inquire whether the department plans to subscribe to any electronic law library or other reference material.

Regarding Court-Related Detention Facilities, the appellate cases heard by the Supreme Court and Court of Appeal that would be housed in the project do not require detention facilities because defendants generally do not appear in court during the hearing of appellate cases.

- F-4) A Mitigation Monitoring and Reporting Program (MMRP) will be prepared as part of the project EIR and approval process. The MMRP will specify monitoring actions, implementation responsibility and mitigation monitoring schedule for each of the mitigation measures set forth in the EIR, including mitigation measures for Impacts F.1 through F.5, which call for implementation of the standard transportation program, as called for in the *Department of General Services Operations Manual*, Sections 1000 *et seq.*

The Department of General Services and occupying agencies have the responsibility for continuing state efforts to reduce employee single occupant vehicle travel through transportation planning measures. Standard state operating practice requires agencies, under Executive Order D-73-88, to prepare and maintain "specific action plans to achieve a minimum of 10 percent reduction in commute trips toward a goal of an average of two employees per vehicle during commute periods." These agency-specific plans are provided to the California Department of Transportation (Caltrans). As noted on p. 148 of the Draft EIR, the Department of General Services, Office of Buildings and Grounds, initiates transportation coordination with agencies at the start of building occupancy. Once the building is occupied, that Office maintains transit and other transportation-related information and coordinates the annual transportation fair for tenant agencies, but does not serve as a central clearinghouse for the submittal of the annual transportation plan updates required by Executive Order D-73-88. Tenant agencies are required to submit an annual report to Caltrans on the progress achieved towards the goal of two persons per vehicle.

Transportation effects of project operations are discussed in the Draft EIR on pp. 127-148. No project-specific significant effects of employee commute travel were identified. It is expected that in the future, market forces related to parking demand will

further discourage the use of automobiles in employee commute travel. The state is encouraging the reduction of conventional business-related trips by authorizing agencies to "redirect up to 25 percent of [their] travel budget toward the purchase, lease or rental of videoconferencing equipment."⁴ A master contract to facilitate procurement of the necessary equipment has been executed. Building design for the proposed project includes videoconferencing facilities for this purpose. The Department of General Services is responsible for statewide implementation of a telecommuting program, and a transportation and office space demand management strategy. This strategy is intended to reduce the number of conventional work-related commute trips, as already demonstrated in a two-year pilot program involving 200 state employee telecommuters. The Department is offering consulting services to assist agencies with planning and implementing the telecommute work option.

- F-5) The demand for 650 housing units referenced by the commenter would not directly be attributable to the project, as the project would not directly result in new employment; rather, state employees not currently in the Civic Center would be relocated to the project, as stated on p. 212 of the Draft EIR. As stated on pp. 212-213 and p. 218, the project could indirectly result in new employment, and resulting housing demand, by "releasing" office space currently occupied by state agencies that would occupy the proposed project. Whether or not new employment is actually created in the released office space would be less a function of the project's construction and occupancy and more a result of overall economic conditions.

As stated in response to Comment E-6, p. 65 of this document, state legislation requires the California Department of Transportation (Caltrans), which owns the Hayes Valley lots referenced by the commenter (the Central Freeway properties) to consult with the City of San Francisco prior to disposing of those lots, which Caltrans has deemed surplus. Housing is a potential use for the Central Freeway Properties.

- F-6) Shadow impacts are described in Section III.C, pp. 61-70. Figures 27-29, pp. 63-65, illustrate shadow effects at 10:00 a.m., 12 noon and 3:00 p.m. on the winter and summer solstices, when the sun is at its lowest and highest points in the sky, respectively, and on the spring and fall equinoxes, when the sun is at its midpoint. As shown in those figures,

⁴ Management Memo signed by the Department of General Services (DGS) and Department of Finance Directors, June 29, 1994

the project would add very small amounts of shadow to Turk and Elm Streets in the winter, when existing shadows cover large portions of those streets, and would not add shadow to either Turk or Elm Street in the spring, summer, or fall. (Fall conditions would be similar to spring conditions.) The project would not shade Van Ness Avenue during the times studied. As shown by the year-round shadow trace, Figure 30, p. 69 of the Draft EIR, project shadows could reach Van Ness Avenue and beyond in the early morning hours, between about one hour and two hours after sunrise. However, as stated on p. 68, Figure 30 depicts project shadow as if there were no intervening buildings. Existing buildings would shade Van Ness Avenue during the times that project shadows would otherwise reach Van Ness Avenue.

As described in detail on pp. 62-67, the project's major impact on solar access and shading would be on the Federal Building plaza.

- F-7) The comments address the project design, and not the adequacy of the Draft EIR. The following is provided for information. Regarding the visual transition between the proposed New State Office Building and the California State Building, as stated in response to Comment F-2, p. 74 of this document, the design-build team has proposed greater articulation that could be designed into the base of the New State Office Building. This would be expected to enhance the compatibility of the new building and the historic California State Building at pedestrian level. The transition between the old and new buildings would be more apparent above the base of each building, where different patterns of fenestration and the varied vertical element of the New State Office Building would contrast with the California State Building. The proposed design changes would be relatively minor, and would not affect the Draft EIR's conclusion that effects related to visual and design factors would not be significant. Regarding existing view lines, as stated in the Draft EIR on pp. 53-60, the New State Office Building would be visible from Civic Center. It would block some views from the existing Federal Building, but would not substantially block public views of the Bay, hills, or other public open space, or of architectural resources in the Civic Center. Therefore, the project would not have a significant adverse effect on Visual Quality or Urban Design.

Regarding the Golden Gate Avenue facade, please see the response to Comment F-2, beginning on p. 74 of this document.

Regarding the sidewalk on Golden Gate Avenue, the effective width (accounting for poles, planter boxes, etc.) is 9 feet, which is not considered extraordinarily narrow. The project would include street trees on the Golden Gate Avenue side of the New State Office Building. Please see also the response to Comment F-2, p. 73 of this document, regarding the proposed arcade.

- F-8) As stated on p. 3 of the Draft EIR, project objectives include consolidation of state office space into state-owned buildings. The project would accommodate existing state agencies and would not increase state employment, as stated on p. 211. As noted by the commenter (see Comment F-8) and discussed in the Draft EIR in Section III.K, Population and Housing, pp. 212-213, and Section III.L, Cumulative Impacts, p. 218, the project could indirectly result in new employment in San Francisco.



**City and County of San Francisco
The Planning Department**

**1660 Mission Street
San Francisco, CA 94103-2414**

December 20, 1994

Christal Waters
Office of Project Development and Management
Department of General Services
400 R Street, Suite 5100
Sacramento, CA 95814

**93.707E NLA: STATE OF CALIFORNIA SAN FRANCISCO CIVIC CENTER COMPLEX:
COMMENTS ON THE DRAFT EIR**

Dear Ms. Waters:

We offer the following comments on the above-referenced DEIR.

PROJECT DESCRIPTION

The Project approvals section of the Project Description Chapter should note that the City must count the office space proposed for the project against the maximum annual limit of development, according to Planning Code section 321(a)(2)(C), Office Development: Annual Limit.

G-1

SOLAR ACCESS AND SHADING

P.S-6, first ¶ of this section. We suggest that you quantify the shadow on the Federal Building plaza as you have later in the Summary under alternatives. It appears that the relevant sentence would read (New language underlined): "In late summer, winter and spring months, existing and net new shadows would place about 90 percent of that plaza in shade at noon."

G-2

p. S-16, second full ¶, p. S-19, ¶2, and Alternatives Chapter, p. 224 and 228. There is a discrepancy in reporting project and existing shadow on the Federal Building Plaza; this same shadow is reported as 75% and 90% of that plaza. Which is correct?

G-3

p. S-24. Table 1-1: Summary of Impacts and Mitigation Measures, C. Solar Access and Shading. Please add impact on other publicly accessible open space, here.

G-4

p.42, Impact a.3, second bullet, third sentence should read (revision underlined): "The project would add new shade to the Phillip Burton Federal Building plaza and UN Plaza; those open spaces are not under the jurisdiction of the San Francisco Recreation and Park Commission."

G-5

WIND

There appear to be discrepancies between the text and the data in the Appendix, although these may be due to varied levels of refinement of the data, including rounding, and so on. For example, p.S-6 summary discussion does not agree with p.A-36, Table B, re: number of

G-6

ADMINISTRATION
(415) 558-6414

CITY PLANNING COMMISSION
(415) 558-6414

PLANS AND PROGRAMS
(415) 558-6264

IMPLEMENTATION/ZONING
(415) 558-6377

FAX: 558-6409

FAX: 558-6426

existing exceedences of comfort criteria (this is due to the original 47 test points versus the constant 38 test points in the two test phases?). There appear to be discrepancies in Table B, see column headed change relative to existing(mph), for location point No.1, 21 mph existing minus 19 with project does not equal -1 change -- is this due to rounding? If so, a note to the table would help. Regarding Table B-2: Hazard Criterion Analysis - Project, it is confusing to report the 26 mph (for one hour per year) standard as 36 mph (10% of the time exceeded) which is the comfort level of reporting, not the hazard level. The asterisk at the bottom of this table does not belong here. Until these discrepancies are clarified or corrected, the reader cannot get a clear picture of project or project-plus-potential-development impacts. Please recheck the text and the Appendix tables for consistency and please clarify these apparent discrepancies. This will make the impacts clearer.

G-6
cont'd.

p.77, ¶ 3, as an update, the 600 Van Ness Avenue development proposal was approved December 15, 1994.

G-7

p.228, Alternative 3, third full ¶. Revise to state that the wind impacts of this alternative, compared to the project, would be expected to be similar or improved.

G-8

TRANSPORTATION

Please see comments from Yvonne Gibson, Transportation Planner for the Department.

G-9

NOISE

Construction Noise. It should be noted in this area containing performing arts uses, that nighttime construction could impact performances and evening government meetings, as well as residential uses.

G-10

p.160. Mitigation G.2: is missing. No mitigation would be required should be stated. Same comment for G.4.

G-11

Would the project comply with the requirements of the San Francisco Noise Ordinance during construction and operation?

G-12

CULTURAL RESOURCES

p.119, first full ¶. We are not certain that the definition of what would constitute prehistoric and/or historic resources is inclusive. Therefore, we suggest the following revisions (underlined): "Prehistoric resources could include chert or obsidian flakes, projectile points, mortars and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources could include stone, brick or adobe foundations or walls; structures and remains with square nails; and refuse deposits such as old wells and privies."

G-13

ALTERNATIVES

Alternative 1: No-Project. The DEIR states that under this alternative, the California State Building would not be renovated/seismically upgraded. It is our understanding that the seismic strengthening of this building is funded and would proceed in any case.

G-14

Alternative 3: Renovate and Reuse 525 Golden Gate Avenue, New Construction at Hastings Site, and Smaller New State Office Building. We assume this alternative would include some excavation at the Hastings site, which may have included prior automotive uses. Wouldn't this alternative have potentially greater impacts related to excavation, such as hazards and possibly cultural resources, as well as potential construction impacts of excavation, for example, those related to surrounding structures?

G-15

Summary and p. 231-231. Alternative 4: Base-Isolation Structural System for the California State Building. The DEIR gives the reduction in area per floor, for the seismic separation and vestibule connector areas between the old and new buildings with this alternative. What would be the total reduction in floor area with this alternative compared to the project? An area of 4,000 sq.ft. is given as the area for the flexible connection; it is not clear whether this includes the area lost for the seismic separation between the buildings. We note that a base-isolation moat, if screened and/or landscaped with consideration of the historic building, need not have an adverse impact on an historic resource, contrary to the conclusion in the DEIR.

G-16

PUBLIC HEALTH AND SAFETY

P.S-33, Mitigation J.2: "The project would include a soil and groundwater quality investigation of the proposed site." Would the sponsor follow the recommendations of the investigation regarding potential further testing, removal, and/or disposal?

G-17

p.S-33, Impact J.9. "Street closures or reduction in street capacity during construction could impede local emergency response actions in the event of a fire or other type of emergency. (Not Significant)." We believe this impact could be significant if not mitigated to assure emergency vehicle access. We request the EIR include the mitigation standard in SF EIR's, including the sponsor's coordination with appropriate City Departments to insure emergency access, including the Fire and Police Departments, Muni and the Department of Parking and Traffic. Coordination with the Civic Center Construction Staging Area, Street and Sidewalk use Plan efforts, would serve as mitigation.

G-18

p.199, indicates no street closures are proposed at this time (aside from sidewalk and parking lane closures). We believe the above mitigation measure should be included in the DEIR, nevertheless, to encompass any instance in which street closure may become necessary during construction.

p.32, last ¶. As an update to the status of seismic strengthening of the old Library, San Francisco voters (in November 1994) approved funding for the seismic strengthening of the old Main Library building for use by the Asian Art museum.

G-19

CEQA FINDINGS

P. 236. Significant Environmental Effects That Cannot Be Avoided If the Proposed Project Were Implemented.

We would probably reach the same conclusion regarding unavoidable significant impacts due to the project, reported here, based on the analyses in the DEIR. That is, there would be significant unavoidable impacts due to cumulative (including the project) traffic increases and transit loadings, because they would cause violations of fine particulate matter (PM₁₀) standards in San Francisco with concomitant health effects and reduced visibility. The significant unavoidable impacts would be related to Air Quality, not transportation itself.

G-20

Section H. Air Quality, of Chapter III, addresses the issue at H.5, pp. 170-171, although we do not consider construction PM₁₀ contributions to cumulative to be significant, because of construction Air Quality mitigations and the temporary duration of the impact. Therefore, we would split H.5 into construction impacts and impacts with the project in place, the former insignificant and the latter a significant cumulative impact. This cumulative significant impact is reported under L. Cumulative Impacts, p. 217, but since section H. also discusses cumulative as well as project specific impacts, it should be included there as well; at the least, p.217 should be referenced there.

ERRATA

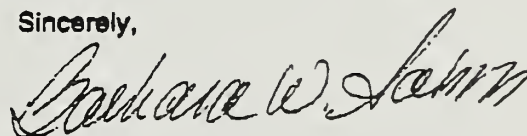
P.42, Impact a.3, ¶1. This sentence should read (revisions underlined): "The project would generally respond to City of San Francisco Master Plan policies, including the Community Facilities, Recreation and Open Space, Transportation, Urban Design, Environmental Protection, Community Safety Elements, and the Civic Center Area Plan of the San Francisco Master Plan."

G-21

We appreciate the efforts the State DGS has made in incorporating San Francisco concerns, as well as analysis assumptions, methodologies, and standards (such as for shading and wind, for example). While the City has concerns and comments, we found this DEIR, in general, to be a well-prepared and understandable document.

If you have any questions, please call Carol Roos at (415) 558-6389.

Sincerely,



BARBARA SAHM
Environmental Review Officer

Letter G - Barbara W. Sahm, Environmental Review Officer, San Francisco Planning Department, December 20, 1994

- G-1) Comment noted. Please see Chapter II, Revisions to the Draft EIR, for the addition of the discussion of the annual limit on office space to p. 40 of the Draft EIR.
- G-2) Please see Chapter II, Revisions to the Draft EIR, for an addition to p. S-6, to amplify the discussion of shadow effects of the proposed project.
- G-3) The presentation of shadow impacts differs slightly between the text for Alternative 2 and the text for Alternative 3; there is no error in the text. As stated on p. 66 of the Draft EIR, existing buildings shade about 15 percent of the Federal Building plaza at noon in March and September. Net new project shadow (the project increment) for the proposed project would add shade to about 75 percent of the plaza at that time, and net new project shadow plus shadow from existing buildings would shade about 90 percent of the plaza. As stated on p. 224 and p. S-16, the project increment for Alternative 2 would be about 60 percent, compared to 75 percent with the proposed project, and the total shadow with Alternative 2 (60 percent) plus existing buildings (15 percent) would be 75 percent (compared to 90 percent with the proposed project). As stated on p. 228 and p. S-19, the project increment for Alternative 3 would be about 15 percent (compared to 75 percent with the proposed project), and the total shadow with Alternative 3 (15 percent) plus existing buildings (15 percent) would be 30 percent, compared to 90 percent with the proposed project. For comparison, the following summary indicates existing, project, and alternative shadow coverage, as a percent of the Federal Building plaza:

Existing	Proposed Project		Alternative 2		Alternative 3	
	Increment	Total	Increment	Total	Increment	Total
15%	75%	90%	60%	75%	15%	30%

- G-4) The project would add a small amount of new shadow to United Nations Plaza in the early evening in late spring and early summer, as described on p. 68 of the Draft EIR, under Impact C.2. Impact C.2 was inadvertently left out of Table I-1, Summary of Impacts and Mitigation Measures. This impact has been revised to refer to open space under the jurisdiction of the San Francisco Recreation and Park Commission; United Nations Plaza is not under the commission's jurisdiction, so the impact statement correctly states that the project would add no new shade to open space under the

commission's jurisdiction . Please see Chapter II, Revisions to the Draft EIR, for revisions Impact C.2 on p. S-24 and p. 67 of the Draft EIR.

- G-5) Comment noted. Please see Chapter II, Revisions to the Draft EIR, for revision to p. 42 regarding project shading of open space.
- G-6) Thirty-eight wind-test points were used to analyze wind effects of the proposed project and Alternative 2. As stated on pp. 74-75 of the Draft EIR, nine of the 47 test points in Phase One were not used in the second phase wind analysis after the Phase One testing indicated they were not likely to be affected by changes in project design, while the remaining 38 points were likely to be affected. The Draft EIR text, p. S-6 and pp. 73-78, as well as the text of Appendix B, consistently reports test results in terms of the 38 test points for Phase Two. The commenter also notes correctly that some reported changes in wind speeds relative to existing speeds in Tables B-1 through B-4 are affected by rounding. All values in the tables representing differences between scenarios were rounded after the subtraction was performed. The net differences in wind speeds are those used to discuss wind effects of the project and alternatives. Rounding seeks to preserve important differences between measured values that would otherwise be obscured.

Regarding the hazard criterion results in Tables B-2 and B-4, as stated on p. 72 of the Draft EIR, there is a difference in the methodology used in calculating exceedences of the pedestrian comfort and the pedestrian hazard criteria. The wind speed data upon which the comfort criteria are based were measured for one minute and averaged. In contrast, the hazard criterion is defined by winds that occur over one full hour. In the EIR analysis, to achieve consistent reporting of wind speeds for both criteria, all speeds are presented as equivalent wind speeds. When stated on the same time-duration basis, the one-hour 26-mph hazard criterion speed is represented by a one-minute average of 36 mph. The key information provided in Tables B-2 and B-4, the hazard criterion data, is whether or not winds exceed the criterion speed for one hour or more.

The asterisk and footnote regarding wind speeds exceeded 10 percent of the time are incorrectly included in Tables B-2 and B-4, as noted by the commenter. Please see Chapter II, Revisions to the Draft EIR, for revisions to those tables on pp. A-37 and A-39, respectively.

- G-7) Comment noted. As stated on p. 77 of the Draft EIR, the 600 Van Ness Avenue project, although not approved at the time the wind analysis was performed, was included in the "project plus potential development" scenarios. That project's approval would therefore not affect the Draft EIR wind analysis.
- G-8) Because Alternative 3 was not specifically tested for wind effects, its expected impact was reported based on testing of the proposed project and of Alternative 2, as well as on testing of bulk models in the Phase One pre-design wind tunnel testing described on pp. 74-75 of the Draft EIR. Please see Chapter II, Revisions to the Draft EIR, for a clarification of p. 228 regarding wind effects of Alternative 3.
- G-9) Comments from Yvonne Gibson, Associate Transportation Planner, and responses to those comments are presented in Comment letter O and the ensuing responses.
- G-10) The nearest performance spaces to the project site are the Veterans Building (one block west, and across Van Ness Avenue), and the Opera House, Bill Graham Civic Auditorium, and George Coates Performance Works (McAllister and Leavenworth Streets), all about two blocks away. With incorporation of Mitigation Measure G.1.b to reduce nighttime noise, p. 160 of the Draft EIR (as revised in this document; please see Chapter II), project construction would not be expected to disrupt nighttime performances. Regarding government meetings, Mitigation Measure G.1.b would similarly prevent disruption of nighttime activities.
- G-11) The commenter is correct. Please see Chapter II, Revisions to the Draft EIR, for revisions to p. 160 to add the two mitigation statements noted by the commenter.
- G-12) The project sponsor (Department of General Services, Office of Project Development and Management) has indicated that the project would comply with the San Francisco Noise Ordinance. It should be noted that Mitigation Measure G.1, p. 160 of the Draft EIR, which is proposed as part of the project, essentially incorporates the construction noise provisions of the San Francisco Noise Ordinance.
- G-13) Comment noted. Please see Chapter II, Revisions to the Draft EIR, for revisions to p. 119 incorporating the recommended language.

- G-14) Funding for rehabilitation and seismic upgrade of the California State Building is included as part of the funding for the project as a whole, as stated on p. 2 of the Draft EIR. If the proposed project or an alternative including construction of a New State Office Building at 455 Golden Gate Avenue were not approved, funding would not be available for renovation of the California State Building. Separate funding for that building would have to be approved. (It should be noted that the state at one time had proposed separate rehabilitation of the California State Building. As noted on pp. 1-3 of the Draft EIR, AB 896 also includes the project component of consolidating statewide-serving agencies in the Civic Center.)

Another way of viewing the economics of the project is to consider the costs of providing the benefits of rehabilitating and reusing the historic California State Building. The construction cost of rehabilitating the California State Building is approximately 245/gross square foot. The construction cost of the New Building is approximately \$164/gross square foot. The entire project consisting of both structures is \$180/gross square foot. Considered on a per square foot construction cost basis, the New Building subsidizes the rehabilitation of the California State Building, as illustrated below:

	<u>350 McAllister</u>	<u>455 Golden Gate</u>	<u>Combined Project</u>
Construction /a/	\$46,400,000	\$132,100,000	\$178,500,000
Contingency /b/	<u>4,600,000</u>	<u>6,900,000</u>	<u>11,500,000</u>
Construction Cost /c/	\$51,000,000	\$139,000,000	\$190,000,000
Gross Sq. Ft.	208,000	845,000	1,053,000
Cost/Sq. Ft.	\$245	\$164	\$180

/a/ Includes \$2.1 million for cafeteria equipment, City taxes and "general conditions"

/b/ Design-build team's contingency

/c/ Does not include \$10 million state contingency, which brings project total to \$200 million

SOURCE: HSH Design-Build, Inc.

- G-15) On the basis of a review of Sanborn maps, pre-1906 land uses on the Alternative 3 Hastings site included a paint shop, a printer's shop, a carriage manufacturer, and a "steam carpet beating works." The remainder of the block included another print shop and an undertaker's business, among other uses. Land uses after 1906 have included auto repair establishments, a carpentry shop, an auto paint shop, and an automobile

bearing manufacturer, while other uses on the block have included other auto-related uses and a battery repair shop. Many of those uses could have resulted in soil and/or groundwater contamination, much as past uses of the proposed project site could have resulted in contamination there that is described beginning on p. 187 of the Draft EIR. Off-site sources could also have caused contamination, as described on p. 190. As stated on p. 228 of the Draft EIR, Alternative 3 would include excavation at the Hastings site. While the volume of potentially contaminated excavated materials, if any, could be greater with this alternative, the type of materials encountered and the required remediation procedures would be expected to be similar to those conditions that would apply to the project, as described in Impacts J.2 through J.4 and Impacts J.6 and J.7, pp. 194-198 of the Draft EIR, and the Mitigation Measures J.2 through J.4, J.6 and J.7, pp. 200-204. With mitigation, the impacts would be less-than-significant for Alternative 3, as for the proposed project.

- G-16) Alternative 4 would have about 10,850 gross sq. ft. (gsf) less in floor area than would the proposed project. The total difference results from combining the figures on p. 230 of the Draft EIR. This calculation also a slight revision to the square footage that would be lost to the "seismic gap," or separation, between the two buildings; it was given as about 500 gsf per floor on p. 230 of the Draft EIR; in actuality, about 560 gsf per floor would be lost by the "pulling back" by an additional 1½ feet of the south wall of the New State Office Building, along its 372-foot frontage with the north wall of the California State Building. This 560-gsf loss per floor would apply to Levels 2 through 11 of the new building (the southernmost of the four vertical elements). Because the basement and Level 1 are designed differently, no space loss would occur on those levels with base isolation. The calculation is as follows: (Separation: 560 gsf per floor x 10 floors = 5,600 gsf) + (Vestibules: 4,000 net sq. ft. ÷ 0.76 net-to-gross ratio ≈ 5,250 gsf); 5,600 gsf + 5,250 gsf = 10,850 gsf. Regarding the moat, please see the response to Comment C-4, p. 56 of this document.
- G-17) As stated in the text accompanying Mitigation Measure J.2, in the last paragraph on p. 201 of the Draft EIR, if hazardous materials were identified, the appropriate regulatory agencies would be notified; any additional investigations would be conducted in accordance with regulatory requirements. The project sponsor would ensure that the site is remediated, as required.

- G-18) As stated in Mitigation Measure F.6, on p. 149 of the Draft EIR, the project would adhere to the recommended actions and practices established by the Civic Center Coordinating Committee, as part of the *Construction Staging Areas, Street and Sidewalk Use Plan* currently in preparation. Also stated on p. 149 is a slightly modified version of a standard San Francisco mitigation measure, which would also be adopted by the state, and which states in part, "[t]he project sponsors and construction contractor(s) would meet with representatives of the City of San Francisco Department of Parking and Traffic (Traffic Engineering Division), Fire Department, MUNI and the Transportation Division of the Department of City Planning, as applicable to determine feasible traffic mitigation measures to reduce traffic congestion and pedestrian circulation impacts during construction of this project . . . "
- G-19) Comment noted. Please see Chapter II, Revisions to the Draft EIR, for revision to p. 32 to update the status of bond funding for the existing Main Library building.
- G-20) Regarding transportation effects, the Draft EIR identified an unavoidable significant effect (Impact F.7, p. 141) in the project's contribution to cumulative effects on regional and local roadways and transit carriers. This is a conservative assessment, as the proposed project, in conjunction with reasonably foreseeable development, would not result in significant impacts at intersections in the project vicinity by the year 2000 (see Table 7, Draft EIR p. 130), and the project's contribution to regional traffic and transit demand would be relatively small. As stated on p. 131 of the Draft EIR, traffic generated by the project itself would increase total traffic on major freeways during the p.m. peak hour by one percent or less. Such increases would not be measurable against the day-to-day fluctuations in traffic volumes. As stated on p. 132 of the Draft EIR (and revised in Chapter II of this document), project-generated MUNI trips would account for 0.6 percent of total MUNI trips in the year 2000, and project-generated BART trips would account for about 0.3 percent and 0.5 percent of Transbay and Westbay ridership, respectively.

As stated on Draft EIR p. 148, because overall cumulative effects could not be mitigated by measures incorporated as part of the project itself, cumulative effects, to which the project would contribute, albeit minimally, would be significant.

Regarding air quality effects, the Draft EIR identified an unavoidable significant effect (Impact H.5, p. 170) in the project's contribution to cumulative levels of particulate

emissions. Because cumulative levels of particulates could not be mitigated by measures incorporated as part of the project itself, cumulative effects, to which the project would contribute, would be significant.

Regarding the analysis of particulate emissions, it is true that for analysis purposes, project construction and operation are treated separately because different types of emissions sources are associated with the construction phase (mostly excavation and grading activities, using diesel-powered heavy equipment) than are associated with the operational phase (mostly motor vehicle trips). Both construction and operation phase emissions are evaluated against applicable significance criteria to determine whether the project itself would result in a significant effect.

From the cumulative perspective, however, it does not make any difference whether PM_{10} (fine particulates) come from construction activities or are entrained from motor vehicle traffic associated with the project's operational phase. During either project phase, the cumulative impact is the same; namely, additional loading into the atmosphere of PM_{10} , together with existing and cumulative PM_{10} emissions, would cause an increase in ambient PM_{10} concentrations that already violate health-based ambient standards on a regular basis in San Francisco.

Regarding cumulative effects in Section III.L, beginning on p. 216, as stated there, that section provides a summary of major cumulative effects that are also discussed in the appropriate topic section in Chapter III, including Impact H.5 referenced by the commenter.

- G-21) Comment noted. Please see Chapter II, Revisions to the Draft EIR, for revision to p. 42 to note the distinction between *Master Plan* Elements and the Civic Center Area Plan.



**City and County of San Francisco
The Planning Department**

**1660 Mission Street
San Francisco, CA 94103-2414**

December 20, 1994

TRANSMITTAL MEMORANDUM

TO: Christal Waters, Senior Environmental Planner
Office of Project Development and Management
Department of General Services
400 R Street, Suite 5100
Sacramento, CA 95814

FROM: Carol Roos, EIR Coordinator *CR*

RE: 93.707E NLA: STATE OF CALIFORNIA, SAN FRANCISCO CIVIC CENTER
COMPLEX: DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

Attached are comments on this DEIR from commenting Department staff and staff of other City Departments. Chapter 31 of the San Francisco Administrative Code, which implements the California Environmental Quality Act (CEQA) locally, specifies that administration of CEQA is the responsibility of the Department of City Planning, acting for the City and County. (Section 31.05[b]). In that capacity, we have gathered and are sending you San Francisco comments, in one package. Thus, our comments will be consolidated in one transmittal. We hope this is more convenient for you as well. The following comments are transmitted herein:

H-1

- James D. Lowe, Transit Planner, Muni. Please note that the Planning Department and Muni assess passenger loading effects on transit differently, using different assumptions and methodology to determine environmental impacts. I will be happy to provide you with further information, if needed.
- Vincent Marsh, Secretary to the Landmarks Preservation Advisory Board
- Jerry Robbins, Department of Parking and Traffic (DPT)
- Deborah Learner, Park Planner and Marvin Yee, Assistant Landscape Architect, Recreation and Park Department
- Susana Montana, Project Manager, Civic Center Study, Planning Department
- Debra Lehane, Civic Design Review Coordinator, San Francisco Art Commission
- Yvonne Gibson, Associate Transportation Planner, Planning Department

Should you have questions about these comments, or need any further information about environmental review issues related to San Francisco as you respond to the comments, please call me at (415) 558-6389.

ADMINISTRATION
(415) 558-6414

CITY PLANNING COMMISSION
(415) 558-6414

PLANS AND PROGRAMS
(415) 558-6264

IMPLEMENTATION/ZONING
(415) 558-6377

FAX: 558-6409

FAX: 558-6426

Letter H - Carol Roos, EIR Coordinator, San Francisco Planning Department, December 20, 1994

- H-1) Comment noted. Individual comment letters and responses to comments from City and County of San Francisco staff are included on the following pages. Regarding the commenter's remark about assumptions and methodology for assessing transit impacts, please see the response to Comment I-2, p. 96 of this document.



SAN FRANCISCO MUNICIPAL RAILWAY 949 PRESIDIO AVENUE, SAN FRANCISCO, CALIF. 94115 415-673-6864



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DEPT OF CITY PLANNING

Carol Roos, Office of Environmental Review

Through: Kathy Gilbert, DGM-CTO *KG*
Peter Straus, Dir. of Service Planning *ES*

From: James D. Lowé, Transit Planner *J. Lowé*

Subject: State of California San Francisco Civic Center Complex, DEIR 1

Date: 21 Nov. '94

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DEPT OF CITY PLANNING

In response to your request for comment on the DEIR for the State's San Francisco Civic Center Complex proposed to be constructed at the northeast corner of McAllister and Polk streets, the following are from the Municipal Railway Service Planning staff:

As discussed in the report, a two year Courts Building project recently began at the northwest corner of this intersection. Muni relocated a 5-Fulton bus stop from that corner to the block discussed in this report. As a result, it should be noted that the project site now has bus stops on both corners on Golden Gate and on McAllister. These stops should be maintained for the convenience of our passengers. Furthermore, the design of the new annex should accommodate these stops, shelters and the clusters of people which congregate near them awaiting the bus.

I-1

If it becomes necessary to relocate a bus stop during the construction phase of the project, the sponsor should contact Art Curtis, Muni Chief Inspector. A bus shelter can be removed by contacting Jim Craig, Construction Supervisor at the Gannett Shelter Poster Company.

Impact F.2, Page 131, states that transit impacts are not significant. It projects that 135 new Muni outbound transit trips will be generated by the project. Cumulatively, 135 new trips is equal to 2.14 coach equivalents of service demand. This is based on 63 riders equalling a full complement of riders on one standard coach. Furthermore, discussion in the report implies that additional riders would use Muni to access regional carriers; these are not included in the count of new Muni riders anticipated. As a result, staff believes that actual new ridership would exceed the 135 riders projected in the report. These additional riders will consist of commuters using Muni to

I-2

travel between the Civic Center Complex, the CalTrain Depot and Transbay Terminal. It should also be noted that Muni is operating most of its lines at capacity (level E) during the peaks and that these extra riders will exacerbate this condition.

I-2
cont'd.

Impact F.6, Page 139 states that truck movements will result in intermittent and temporary transit impacts. The project sponsor should develop mitigation measures to keep these impacts to a minimum, especially in the AM and PM peak rush hours.

I-3

Cumulative Project Impacts: The report states that this project will only have moderate transit impacts. However, when these "moderate" impacts are combined with the impacts from other projects proposed or currently under construction in the immediate area, i.e. Asian Art Museum, New Main Library, and the Courts Building, travel demands on transit and on the street system will be compounded. More important, however: as we have commented on other projects, we believe the only appropriate way to assess cumulative impact on transit is the way we have summarized it for page 131, Impact F.2, above.

I-4

It should also be noted that the project is in the Downtown area; however, as a State project it is exempt from the Transit Development Impact Fee (TDIF) currently levied on private development in the same area. Since the impacts on transit will be similar, we would like to suggest that the City solicit an equivalent contribution from the sponsors. The second paragraph on Page 134 implies that the State will follow City Plans and Codes even when not bound to do so. For example, the State is paying for parking as per code; similarly they should pay for the transit impacts this project will create.

I-5

cc: K Gilbert
PS, JDL, SP Chron

Letter I -- James D. Lowé, Transit Planner, San Francisco Municipal Railway, November 21, 1994

- I-1) Comment noted. As stated in Mitigation Measure F.6, on p. 149 of the Draft EIR, the project would adhere to the recommended actions and practices established by the Civic Center Coordinating Committee, as part of the *Construction Staging Areas, Street and Sidewalk Use Plan*. Included in an Appendix to the *Plan* are Traffic Specifications by the San Francisco Department of Parking and Traffic, specifically the following requirement for coordination with MUNI:

"Contractor shall notify the Chief Inspector of the Municipal Railway at (415) 923-6262 at least ten (10) working days in advance of the start of any work in existing passenger loading zones for buses on each street where such work would interfere with passenger loading and unloading operations.

"1) The Municipal Railway, during this time, at no cost to Contractor, will temporarily relocate loading and unloading zones as necessary and as feasible."

- I-2) The commenter is correct that there would be additional transit riders that would use MUNI to access the CalTrain depot and the Transbay Terminal (for AC Transit) as a result of the proposed project. Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 131 to correct the estimated breakdown of project-generated transit trips.

Analysis of transit impacts in the Van Ness Avenue Corridor / Civic Center area is not conducted on a line-by-line basis, but rather on a corridor basis, because there are various MUNI lines in this area available to serve riders within the travel corridors. The EIR uses the corridor-based analysis because it is not possible to predict accurately which individual transit lines future riders would use, only which corridor they would use. Additionally, it can be assumed that if a rider desired to take one line that was operating at or near capacity, he/she might switch to another line, within the same corridor, that was operating below capacity. Therefore, the corridor-based analysis gives a more accurate prediction of overall MUNI operations than would a line-by-line analysis. The 210 net new MUNI trips (MUNI-only plus MUNI to CalTrain or AC Transit) generated by the project would be dispersed among these various lines rather than concentrated on one line, in one direction at a time. The increase in load factors within the transit corridors would be no more than 0.01, a less-than-significant impact on transit capacity.

- I-3) See Mitigation Measure F.6, page 149 of the Draft EIR, for measures designed to minimize the intermittent and temporary impacts from construction truck movements.
- I-4) Cumulative transit impacts are discussed on pp. 132 and 146 of the Draft EIR. As stated on p. 132, project-generated MUNI trips would account for about 0.4 percent of the total MUNI trips in year 2000; that contribution percentage remains unchanged with the addition of MUNI trips from the project site to CalTrain and AC Transit. See the response to Comment I-2, above, for the analysis methodology used for this report.
- I-5) As stated on p. 134 of the Draft EIR, it is state policy for the proposed project to conform with local plans and codes, insofar as possible. For information, the project would include up to 75 parking spaces, fewer than the City Planning Code requirement of 1,460 spaces, but would not involve payment of any parking-related fee. The state does not propose payment of a transit-related fee.



LANDMARKS PRESERVATION ADVISORY BOARD

1660 MISSION STREET, 5TH FLOOR, SAN FRANCISCO, CA 94103

TEL (415) 558-6345 • FAX (415) 558-6426

December 14, 1994

Ms. Christal Waters, Senior Environmental Planner
 San Francisco State Building Authority
 and California Department of General Services
 400 R Street, Suite 5100
 Sacramento, CA 95814

**RE: 93.707ER--(NLA) State of California--San Francisco Civic Center Complex,
 DEIR**

Dear Ms. Waters:

At its Regular Meeting of December 7, 1994, the San Francisco Landmarks Preservation Advisory Board had the opportunity to review and comment on the above referenced DEIR. The Landmarks Board comments are as follows:

- | | |
|--|-----|
| Page 80: First paragraph. last line: Delete proposed. | J-1 |
| Page 81 Map: | |
| a. Indicate that both 170 Fell Street and 135 Van Ness Avenue are part of the High School of Commerce and are part of Landmark No. 140. | J-2 |
| b. Indicate that Civic Center is also on the California Register of Historical Resources. | J-3 |
| c. Delete shading of buildings on Golden Gate Avenue and on Turk Street. | J-4 |
| d. Delete proposed on titles for Civic Center Historic District. | |
| e. Change boundaries of local Civic Center Historic District to include Assessor's Block Number 355. [The Board of Supervisors approved the Historic District on second reading on December 12, 1994. The local Historic District now awaits the Mayor's signature.] | J-5 |
| f. Indicate outlines of Veteran's Building and Opera House. CL.-84 notation probably should be indicated for both buildings as well as Memorial Court. | J-6 |
| g. Map does not include Heritage 'D' rated properties. | J-7 |

Ms. Christal Waters
Page 2
December 14, 1994

- Pg. 82. Delete either Moulin Studios or Carey and Company on photo caption. J-8
- Pg. 83. First paragraph, third line: Delete proposed; insert approved. J-9
- Third paragraph, third line: Insert individual City landmarks. Fourth line, delete: as such if the local Historic District is adopted. Fifth line: Insert after demolition of contributory and/or contributory altered buildings. J-10
- Fourth paragraph: Indicate that Civic Center Historic District is also listed on the California Register of Historic Resources by virtue of the fact that said buildings are listed on the National Register of Historic Places. (Assembly Bill No. 2881, Chapter 1075.) Fourth paragraph, third line: Delete limit; insert control; delete in, insert to. Sixth line: Delete would a city; insert does the locally. Delete would; insert does. J-11
- Pg. 84. Second line from bottom: Delete on the site of an originally proposed Opera House. J-12
- Pg. 85. First line: Add s to Buildings J-13
- Second paragraph: Delete is considered; insert are designated. Second line: Delete proposed. Fifth line: Insert after Avenue: 170 Fell Street. J-14
- Third paragraph, first line: Delete all; insert most. Add neg- to classical. After vocabulary insert (with the exception of the High School of Commerce at 135 Van Ness Avenue which is Spanish Colonial Revival in style with Churrigueresque detailing). Third and fourth lines: Change wording on "its dome tops off at 300 ft., considerably above the building's 80-ft. high wings." Fourth line: Delete hyphen between Beaux Arts. J-15
- Fourth paragraph: Start with Noncontributory Civic Center Historic District structures include: After Avenue insert which. Line four: Delete all under 50 years old, have not been designated as Insert are not. J-16
- Pg. 86. Second paragraph, last line: Delete major. Insert an after the. Insert rear of the. J-17
- Last paragraph: Change ampersands throughout to and. J-18
- Pg. 89. Second paragraph, second line: Delete considered; insert designated. J-19
- Third paragraph: Change Casey to Carey. J-20
- Last paragraph, second line: Change 75 to 80; third line, check terminology ring-shaped? Last line: delete Italian. After Renaissance, insert Revival. J-21

Ms. Christal Waters
Page 3
December 14, 1994

Pg. 90.	Move Table 3 to pg. 99 or end of Section E, Cultural Resources.	J-22
Pg. 91.	Question raised as to how Janitor Closets were rated contributory.	J-23
Pg. 92.	Question raised under Standard Floor Finishes as to how brown battleship linoleum and unfinished concrete are considered significant building components.	J-24
Pg. 92.	Question raised under Interior Glazing as to difference between celestory and transom windows.	J-25
Pg. 93.	Question raised under <u>Light Fixtures</u> about period contributing fluorescent light fixtures. Last paragraph, sixth line: Delete level, insert <u>division</u> . Seventh line: Delete building; insert <u>facade</u> .	J-26
Pg. 95.	Second paragraph, first line: Delete both side elevations extend around. Capitalize <u>The</u> same line. Delete with; insert <u>reflect</u> . Fifth line: delete detailed similarly; insert <u>similar</u> .	J-27
Pg. 101.	Last paragraph, tenth line: Delete restored. Insert <u>recreated</u> . Twelfth line: delete has not been located. Insert: <u>will not be replicated</u> . Same line: Delete provide; insert <u>substitute</u> .	J-28
Pg. 119.	Footnote numbers 9 and 10 do not correspond with the text in Section E. Cultural Resources.	J-29

Staff is available at 558-6345 to answer additional questions or provide technical assistance about the above referenced comments. Patrick McGrew, President of the Landmarks Board, may also be reached at 981-3060 about comments on this DEIR.

Sincerely,

VINCENT MARSH

Vincent Marsh
Secretary to the Landmarks Board

VFM:mj:CivicCen.Ltr

cc: Barbara Sahm
Carol Roos

Letter J - Vincent Marsh, Secretary to the San Francisco Landmarks Preservation Advisory Board

Some of the comments in this letter refer to minor editorial corrections that do not affect the substance or meaning of the Draft EIR text. In such instances, which are noted in these responses, no correction of the Draft EIR text is warranted.

- J-1) Subsequent to publication of the Draft EIR in November 1994, the City of San Francisco approved the Civic Center Historic District that was proposed at the time of Draft EIR publication. Please see Chapter II, Revisions to the Draft EIR, where the Draft EIR text on pages S-7, S-14, 80, 83, 85, 89, 101, 111, and 220 has been revised to reflect adoption of the Historic District in December 1994. Please also see revised Figure 31 in Chapter II, which has been updated to reflect the adopted district boundaries and contributory buildings.
- J-2) Please see revised Figure 31 in Chapter II, Revisions to the Draft EIR.
- J-3) The last partial paragraph on p. 83 of the Draft EIR acknowledges that the National Register Districts are on the California Register of Historic Places.
- J-4) Please see revised Figure 31 in Chapter II, Revisions to the Draft EIR.
- J-5) Please see revised Figure 31 in Chapter II, Revisions to the Draft EIR.
- J-6) City Landmark No. 84 is shown in Figure 31 to include the entire War Memorial Complex. No change to Figure 31 is required.
- J-7) Properties rated "D" by the Foundation for San Francisco's Architectural Heritage are not included in Figure 31 because the "D" rating indicates that a property is of "minor or no importance" because it is either an insignificant example of architecture by virtue of original design and/or insensitive remodeling.
- J-8) The photo in Figure 32, Draft EIR p. 82, was included in the February 25, 1994, Carey & Co. *Building Evaluation Report* for the California State Building; Carey obtained the original photograph from the Moulin Studio Archives. No revision to the photo caption is required.

- J-9) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 83 to indicate that the local Civic Center Historic District has been approved.
- J-10) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 83.
- J-11) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 83.
- J-12) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 84.
- J-13) The reference to the Veterans Building on p. 85 is to distinguish it from the Opera House. No change to the Draft EIR text is required.
- J-14) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 85.
- J-15) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 85. No change is required regarding the editorial comment concerning the description of the City Hall dome.
- J-16) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 85.
- J-17) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 86.
- J-18) No revision is required for this editorial comment.
- J-19) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 89.
- J-20) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 89.
- J-21) The roof line of the California State Building is 80 feet in height, as noted on p. 111 of the Draft EIR, while the cornice is approximately 75 feet tall. The 75-foot reference on p. 89, noted by the commenter, is to the cornice, which, as one looks at the building, is "the visual terminus of the building," not the roof. The term "ring-shaped" in this context implies the building surrounded open courtyards on the lower stories.

Both the National Register of Historic Places nomination form and the Landmarks Preservation Advisory Board's Case report for the Civic Center Historic District refer to the style of the building as "Italian Renaissance."

- J-22) No revision is required for this editorial comment.
- J-23) The janitor closets are part of the original public restrooms and are therefore considered to have historic significance.
- J-24) Brown battleship linoleum and unfinished concrete were original or early flooring materials used in the California State Building. They are judged to have significance because they are an original or period material or finish, as are undecorated plaster walls, ceramic tiles, wood moldings, or other plain or common materials. A building component need not be rare, decorative, or "pretty" to have historic significance.
- J-25) As used in the Draft EIR, "clerestory window" refers to glazing above interior partition walls. "Transom window" refers to glazing above interior doors.
- J-26) The Building Evaluation Report provides the following description of the light fixtures referenced by the commenter: "These units are bronze tone, concave rectangular pendants with scrolled-end medallions, and are typically found in a very special offices." The offices in which they are located include the Judges' Suites. These fixtures are integral to the design of these offices, which were remodeled in the 1940s. They are considered a contributing feature, as are the offices' wood paneling, moldings, doors, and other similar features, since they were all installed at the same time.
- Please also see Chapter II, Revisions to the Draft EIR, for a revision to p. 89 (where the last paragraph on p. 93 begins) regarding the building's exterior.
- J-27) No revision is required for this editorial comment.
- J-28) As much as is feasible, the Supreme Court Room would be restored based on the original design, as stated on p. 101 of the Draft EIR. What remains of the existing original walls and truncated-dome ceiling would be restored, while missing features would be reconstructed. Extensive searches for the original Arthur Mathews mural have been conducted over the years, including historic research for the Building Evaluation Report

III. Written Comments and Responses

by Carey & Co. Although it is now unlikely that the mural will be found, it is possible that the mural may be located in the future, in which case it could be restored.

- J-29) Note 9, Draft EIR p. 95, should refer to the Carey & Co. *Building Evaluation Report*. Note 10, p. 99, refers to Endnote 9 on p. 120, and each succeeding Endnote is off by one number; the second Note 17, p. 103, does refer to Endnote 17 on p. 120.

OFFICE OF
ENVIRONMENTAL ACTION

MEMORANDUM

Date: December 16, 1994

From: Jerry Robbins

To: Carol Roos, OER

Subject: Comments on State Building EIR

We have reviewed this draft EIR dated November 4, 1994, and have the following comments:

Page 8-9, third paragraph: The author of the summary has confused long-term and short-term type parking demand with parking demand that is needed "in the long-term" and "in the short-term." Page 132 of the text has it right.

K-1

Page 121, second paragraph: The US 101 off-ramp should be described as at 13th and Mission Streets, not "13th and Otis Street."

K-2

Page 121, last paragraph: The statement "...there is still no connection between US 101 and the northern portion of I-280" is not accurate. There is currently a temporary connection from northbound US 101 to northbound 280.

K-3

Page 126, second paragraph: The report should mention that the McAllister Street frontage of the project is currently designated for vanpool parking only 6-9 AM Monday-Friday. Vanpools with permits can park here all day and are exempt from putting money in the meters. These spaces will be relocated once construction of the State Building begins, probably to the east side of Polk Street across from City Hall.

K-4

Page 126, 3rd paragraph: The report should describe the frequency of special events which would cause the garage to fill up. Once Civic Auditorium reopens, this could happen quite often.

K-5

Page 134, last paragraph: More information should be provided about the proposed bicycle parking. Where will these spaces be located? Will lockers or bicycle racks be provided? Will they accommodate employees or visitors? Will employees be allowed to bring bicycles into the building?

K-6

Page 135, second paragraph: The report should discuss pedestrian safety. Jaywalking across Golden Gate Avenue between the State Building and the Federal Building is quite common, as both of these buildings have midblock entrances. The expansion of the State Building will increase the frequency of this. Mitigation measures which would discourage pedestrians from crossing mid

K-7

block should be developed.

Page 138, last paragraph: The description of the loading spaces is not very specific. How long will they be? Where will they be located? K-8

Page 139, second paragraph: The new SF Courts Building at Polk/McAllister should be included in the list of other projects which will be under construction soon, although this project may be completed before construction on the State Building begins. K-9

Page 139, 4th paragraph: Pedestrian circulation around the site during construction is still being worked out. The project sponsor has requested closing the sidewalk on Golden Gate Avenue during construction. This request has not yet been approved. K-10

Page 140, third paragraph: On McAllister Street, MUNI has stops at both Larkin and Polk Streets. Golden Gate Transit stops only at Larkin Street. K-11

Page 140, 4th paragraph: We suggest the first sentence in this paragraph read "According to standard City traffic specifications, truck movements are prohibited between 7:00 a.m. and 9:00 a.m. and between 3:30 p.m. and 6:00 p.m. in order to minimize peak period traffic congestion." K-12

Page 149, first paragraph: There is a draft "Construction Staging Areas, Street and Sidewalk Use Plan" dated October 1994. It stipulates that construction truck movement would be permitted only between 6:00 a.m. and 7:00 a.m., between 9:00 a.m. and 3:30 p.m. and after 6:00 p.m. Exemptions from this may be granted by the city on a case-by-case basis if deemed justified and appropriate. K-13

Page 150, note 3: My title is "Transportation Planner" not "Traffic Engineer." K-14

Page 151, note 16: refer to the October 1994 draft instead of the May draft. K-15

Please call me at 554-2343 if you have any questions regarding these comments. You may also wish to contact Tom Sorrentino of our office at 554-2345 regarding construction related issues. Thank you for the opportunity to comment on this EIR.

cc: Tom Sorrentino
Bill Wycko

JR/staceelr

III. Written Comments and Responses

Letter K - Jerry Robbins, Transportation Planner, San Francisco Department of Parking and Traffic, December 16, 1994

- K-1) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. S-9 to clarify the discussion of long-term and short-term parking.
- K-2) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 121 to clarify the location of the referenced off-ramp.
- K-3) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 121 to correct the discussion of the U.S. 101 - I-280 interchange repairs.
- K-4) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 126 to include a discussion of vanpool parking.
- K-5) As reported in the San Francisco Main Library EIR (90.808E), special events were held in Brooks Hall and Civic Auditorium about 90 weekdays per year. Many of these events were conventions that were national in scope, and those attending were bused from hotels to the convention facilities. As stated on p. 134 of the Draft EIR, it was estimated that on less than half of the 90 event-days, event patrons generated parking demand approaching "peak-event" demand. Based on observations during the Harvest Festival, the most heavily attended weekday event at Brooks Hall or the Civic Auditorium, on major event days, the only available on-street parking was generally located south of Market Street, more than one quarter of a mile away. Fulton Street between Larkin and Hyde Streets was 100 percent occupied on these days, as well as on Wednesdays, when the Farmers' Market was held at United Nations Plaza.
- K-6) Bicycle parking would be included in the basement of the New State Office Building, and would be accessible via the main parking ramp from Polk Street. Bicycle parking for employees would be in an enclosed area. The state would further evaluate opportunities for providing public bicycle parking during design development.
- K-7) Please see Chapter II, Revisions to the Draft EIR, for an addition of text discussing jaywalking to p. 135 of the Draft EIR.

- K-8) Proposed loading spaces are illustrated in the Draft EIR in Figure 8 (Level 1), p. 14. As shown, the loading dock would be located on the Larkin Street side of the New State Office Building, mid-block, near where the new building and existing California State Building would meet. Additional detail on loading design would be developed in further project planning.
- K-9) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 139 to add the San Francisco Courts Building to the discussion of construction in the project area.
- K-10) Comment noted. No revision to the text is required. Mitigation Measure F-6, p. 149 of the Draft EIR, would require the project sponsors to consult with City staff regarding construction traffic effects.
- K-11) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 140.
- K-12) Please see Chapter II, Revisions to the Draft EIR, for an addition regarding standard City traffic specifications and construction truck traffic to p. 140 of the Draft EIR.
- K-13) Please see Chapter II, Revisions to the Draft EIR, for a revision to the discussion following Mitigation Measure F.6 on p. 149 of the Draft EIR.
- K-14) Please see Chapter II, Revisions to the Draft EIR, Endnote 3, on p. 150.
- K-15) Please see Chapter II, Revisions to the Draft EIR, Endnote 16, on p. 151.

City and County of San Francisco

Recreation and Park Department



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CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

December 14, 1994

Ms. Christal Waters
Senior Environmental Planner
Department of General Services
Office of Project Development and Management
400 R Street, Suite 5100
Sacramento, CA 95814

c/o Ms. Barbara W. Sahm
Environmental Review Officer
Department of City Planning
1660 Mission Street
San Francisco, CA 94103-2414

Dear Ms. Waters,

The City and County of San Francisco Recreation and Park Department (Rec/Park) appreciates the opportunity to review the "State of California San Francisco Civic Center Complex - Draft Environmental Impact Report" (DEIR). Although State of California projects are under no obligation to be in compliance with local policies and codes, the following comments and concerns relevant to the preservation of park and open space quality are offered for consideration.

The Civic Center Complex DEIR is very thorough in identifying impacts of the proposed project upon nearby public open spaces, including Civic Center Plaza, the Federal Building plaza and United Nations Plaza. The DEIR correctly identifies Civic Center Plaza as the only site within the proposed project's vicinity under the jurisdiction of Rec/Park. Yet, Rec/Park is very supportive of all available public open spaces since *collectively* they contribute to the open space needs of a community. For this reason, Rec/Park is also concerned about the impacts of the proposed project upon the Federal Building plaza and United Nations Plaza.

Solar Access and Shading Impacts

Following are excerpts from the DEIR, which note adverse shading impacts the proposed project will have upon existing open spaces:

- "C.1: The project would add shade to streets, sidewalks and the Federal Building plaza. Shadow effects on the plaza would limit public use." (page S-24)

McLaren Lodge, Golden Gate Park
Fell and Stanyan Streets

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- "The New State Office Building, at 209 ft., would be greater in height than existing buildings in the Civic Center core...and the project would have shadow and wind effects on open spaces..." (page 43)
- "The New State Office Building would add shade to United Nations Plaza. The new shadow would affect about a 750-sq.-ft. area near the BART entrance south of the Old Federal Building. This shading would continue for about 15 to 20 minutes a day, about one hour before sunset (around 7:00 p.m. to 7:30 p.m. PDT), in late spring and early summer (June and July)." (page 68)

The impacts of the proposed project may appear to be minor in comparison to existing shade conditions exhibited at these open space sites. In addition, areas of new shade may appear to be insignificant compared to the overall area of respective sites. Nonetheless, the *incremental accumulation* of newly shaded areas from new development, such as the proposed project, would wholly affect the quality and long-term usefulness of these open spaces.

L-1

Wind Impacts

The DEIR identifies adverse wind conditions due to the proposed project as follows:

- "In relation to the City's Pedestrian Comfort Criterion, the project would cause four new exceedences of the 11 mph criterion: Near the southeast corner of the Federal Building plaza (increasing from 10 mph to 15 mph);...and near the northeast corner of Civic Center Plaza (from 9 mph to 16 mph)." (page 76)
- "At test locations in the north end of Civic Center Plaza, the project would increase wind speeds at one location, from 14 mph to 17 mph, and at a second, from 9 mph to 16 mph." (page 76)
- "A test location near the Civic Center Plaza tot lot (playground) would change from 9 mph, above the 7 mph seating criterion and below the Pedestrian Comfort Criterion, to 16 mph with the project, exceeding the pedestrian criterion." (page 77)

According to the DEIR, existing eight to thirteen-mph-wind conditions "will disturb hair, cause clothing to flap, and extend a light flag mounted on a pole" (page 71). With the proposed project, 13 to 19-mph-wind conditions "will raise loose paper, dust and dry soil, and will disarrange hair" (page 71). Increased wind velocities due to the proposed project would intensify the already windy conditions characteristic of the area and adversely affect the comfortable use of open spaces.

L-2

Preferred Alternative

Rec/Park does support the City's goal of establishing an efficient Civic Center Complex and realizes that such impacts on existing open spaces are inevitable. Nevertheless, these impacts should be minimized when possible. Therefore, Rec/Park supports Alternative 2 of the proposed project, which includes a new, 13-story State Office Building (versus a 16-story building of the proposed scheme) and a reuse of 525 Golden Gate Avenue for the following reasons:

- Alternative 2 would provide the State Department with the same square footage as the proposed project.
- Alternative 2 would comply with the Civic Center Plan to locate governmental agencies within a central area.
- Alternative 2 would have less shade impacts on existing open spaces in comparison to the proposed project.
- Alternative 2 would improve wind conditions in the vicinity more favorably than the proposed project.
- The DEIR indicates that an increase in employment would accompany the State of California project, thereby increasing demands for open space within the vicinity. The preservation of quality open space for local use thus becomes more significant, particularly when considering that the district in which Civic Center is located (Tenderloin District) has been identified as a high-need area for additional open space. Reducing the quality of existing open spaces would reduce the amount of functional open space, thereby negating Rec/Park's efforts in improving the open space system within the area. Nonetheless, such adverse impacts may be mitigated with contributions to the development of other local, recreational open spaces.

L-3

The additional cost of Alternative 2 for development and operation and maintenance (O&M) costs was noted in the DEIR as being "less economical" (page 222) and thus less acceptable. As the DEIR states:

"Over a 25-year payback period, the project would have a construction cost of \$200,000,000 and total principal, interest, and O&M costs of about \$748,000,000. Alternative 2 would have a construction cost of \$201,000,000 and a payback of about \$770,000,000, with the difference primarily reflecting higher O&M costs." (page 222)

The cost to implement Alternative 2 would be merely 0.5% more for construction cost, and only 3% more on the total payback than the proposed project. Preservation of existing quality open space may be worth the fractional increase in cost.

Rec/Park supports the San Francisco Civic Center Plan and lauds the State Department's decision to reestablish presence in this core area. Although such state projects are not obligated to conform to local policies and codes, Rec/Park hopes that the concerns and comments presented in this correspondence may be considered. If you have any questions, please do not hesitate to contact Deborah Learner at (415) 666-7087, or Marvin Yee at (415) 666-7130.

Sincerely,



Deborah Learner
Park Planner



Marvin Yee
Assistant Landscape Architect

civiceir.doc

Letter L - Deborah Learner, Park Planner, and Marvin Yee, Assistant Landscape Architect, San Francisco Recreation and Park Department, December 14, 1994

- L-1) The comment notes that the Draft EIR addresses shadow impacts on both the Federal Building plaza and United Nations Plaza. As stated in Impact C.1, p. 62 of the Draft EIR, net new project shadow could limit use of the Federal Building plaza. As stated on p. 67, project shadow would detract from an existing environment that is somewhat undesirable due to existing winds. As stated on p. 70, the project's shading of a small area of United Nations Plaza in the late afternoon in late spring and early summer would not be expected to limit substantially the use of that space. The Draft EIR acknowledges potential adverse effects on the usability of the open space due to shadow but, considering all factors, including time of day and season, concludes that the *adverse* effect would not be *significant*.
- L-2) Project effects on wind are described in Draft EIR Section III.D, beginning on p. 71. The commenters correctly note the effects of increased wind speeds at particular locations. Overall, wind effects would not be substantially greater with the project than with existing conditions. It should be noted that the phrases quoted by the commenters from p. 71 of the Draft EIR do not describe project wind effects. Rather, p. 71 of the Draft EIR that discusses existing wind conditions in San Francisco and characterizes winds by describing their effects on pedestrians. The project, while increasing winds in some locations, would decrease winds in other locations, and could improve winds overall. As stated in Impact D.1, Draft EIR p. 74, "the wind environment with the project would be about the same, or improved overall, compared to existing conditions, with the project." With the project (and the project plus potential development), there would be fewer exceedences of the 11-mph pedestrian criterion at the 38 points tested, winds would decrease at more locations than they would increase, and there would be fewer exceedences of the 26-mph hazard criterion.
- L-3) The commenters express a preference for Alternative 2. Impacts of Alternative 2 are discussed on pp. 223-225 of the Draft EIR, where it is noted that this alternative would result in less new shadow on the Federal Building plaza than would the project, and that wind effects of this alternative would be similar or improved, compared to those of the project. Regarding the feasibility of Alternative 2, please see the Supplemental Analysis of Alternative 2, p. 5 of this document.



**City and County of San Francisco
The Planning Department**

**1660 Mission Street
San Francisco, CA 94103-2414**

December 19, 1994

TO: Christal Waters, Senior Environmental Planner
State of California Department of General Services
Office of Project Development and Management

From: Susana Montaña, Project Manager
Civic Center Study *SM*

RE: 93.707E NLA: State of California, San Francisco Civic Center Complex
DEIR; OPDM 0457.

I have reviewed the above-referenced Draft Environmental Impact Report (DEIR) on the proposed State Office Building in Civic Center and have the following comments noted, first, by general topic and then by page number:

General Topic

1. Conformity With Local Laws. The report frequently cites as criteria of significance local zoning laws or wind standard laws and then, cryptically, states that the State is exempt from local codes. I would like the document to state and cite specific State laws, statutes, etc. that exempt the Project Sponsor/Project from local laws. The Department requested such documentation in the past and the DGS responded in a letter dated November 22, 1994 with a summary of a seemingly relevant previous court ruling (City of Orange v. Valenti--1974). The City Attorney's Office is questioning the relevance of this court ruling. The DEIR should cite the specific law(s) which states that a local government entity may not interfere with exercise of the State's "sovereign power" to build a building on its' property as it wishes.

M-1

2. Urban Design Feature versus Wind Reduction.

- A. The Project features a "canopy" at the 50 foot level on the Golden Gate Avenue facade which extends 22 feet into the City's Right-of-Way along the entire length of the property. This is mentioned as a "Visual and Design Factor" on page S-5 of the DEIR:

"Along Golden Gate Avenue, the New State Building would be a 16-story element; the vertical facade would be broken by a 22-ft.-wide canopy, 50 ft. above the sidewalk."

M-2

Is this canopy a design feature to "break up" the appearance of the Golden Gate facade or is it a wind baffle/wind reduction element, or is it both? If the canopy is later not desired as a visual factor, would there be changes in the wind conditions at pedestrian level along Golden Gate Avenue should it not be built or later removed? Please clarify as to the function of the canopy.

ADMINISTRATION
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Susana Montafia State Office Building DEIR Comments, 93.707E

- B. The Project features a setback at pedestrian level along most of the length of the Golden Gate Avenue facade. Is this an urban design feature or a wind reduction feature? If the Project were built to the property line, would there be changes in the pedestrian comfort level? Would there be difficulties in opening the entrance doors to the building due to strong winds?

Objective 1, Policy 8 of the proposed Civic Center Plan recommends buildings to be built to the property line with pedestrian-interest activities taking place within the building at the ground level. To fulfill this goal, clear glass windows with high volume activities at ground level which can be seen by the pedestrian passers-by should be provided; the windows should be lit at night with light penetrating onto the sidewalk space. The proposed Project does not satisfy this goal. The proposed recessed walkway ("twin arcades") may be intended to protect Project clients/workers/visitors from unpleasant winds along Golden Gate, however it also "kills" the pedestrian environment. Landscaped features and arcades provide dull and unfriendly spaces, including nooks and crannies that are dark and formidable at night. This increases the perception of danger, rather than the perception of safety. Well lit, clear glass space at the property line would create visual interaction and a perception of safety and interest; arcades do not. Arcades and setbacks should not be incorporated within the Project design. If winds are a concern, other design measures should be considered.

M-2
cont'd.

3. Public Safety. The Civic Center is currently perceived as dark and dangerous at night. The Project will bring 1,575 new employees to the area, most of whom will commute by public transit. There has been demand by area residents, merchants and patrons for pedestrian-scale street lights which would help people feel safer walking from transit to their Civic Center destinations after dark. The Project should contribute resources to the City to install pedestrian-scale street lights on pedestrian corridors from BART and MUNI stations to the project site. The nearby YMCA organization solicited private funds to increase the wattage on some street lights leading from BART and MUNI to its facility at Golden Gate and Leavenworth Street. Increased wattage is not a satisfactory solution as the light is directed to the street (for vehicle traffic) rather than to the sidewalk and the foliage of street trees reduces light penetrating onto the sidewalk. A pedestrian scale "arm" for the traffic light standard would be a more suitable solution. The State should fund the installation of these street lights leading from the transit stations expected to serve workers and visitors to the Project. Without this lighting plan and program, it cannot be assumed that workers and visitors will use transit and, therefore, the traffic impacts in the DEIR may be considered inaccurate.

M-3

Susana Montaña State Office Building DEIR Comments, 93.707E

Specific Page CommentsPage.

- | | | |
|------|---|------|
| S-5 | Please specify that the "twin arcade" is a "Visual and Design Factor", along with the canopy if this is accurate. Please describe somewhere in the DEIR the visual elements of the arcade. Is it landscaped, lit at night, are there benches, kiosks or coffee carts within? What would the pedestrian see from the property line along Golden Gate Avenue? | M-4 |
| S-6 | Please note under "Solar Access and Shading" that the United Nations Plaza is not subject to the provisions of Section 295 of the Planning Code. | M-5 |
| S-24 | I think that the canopy and arcade may be wind recution measures which should be listed under D.1 Wind in Chapter III, Impacts. | M-6 |
| 21+ | Please show the Golden Gate elevation and section to indicate details of the canopy and arcade. Figures 4 and 8 are not adequate to show these elements. | M-7 |
| 33 | Please specify why and how the State is exempt from local land use laws and the Master Plan; cite statute and/or ordinance. | M-8 |
| 35 | Please add Policy 5 to Objective 2: "Use care in remodeling of older buildings, in order to enhance rather than weaken the original character of such buildings". | M-9 |
| | Please add Policy 6 to Objective 3: "Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction." | M-10 |
| | Please add Policies 8 and 10 to Objective 4:
Policy 8: "Provide convenient access to a variety of recreation opportunities."
Policy 10: "Encourage or require the provision of recreation space in private development." | M-11 |
| 36 | Please note that the <u>Civic Center Study--Draft for Citizen Review</u> was published in October 1994 and is under review. | M-12 |
| 37 | Please include Policy 8 of Objective 1 which states: "Encourage visual interest for pedestrians and pedestrian-interactive ground floor uses within existing historic buildings and in new buildings within the core area. In adaptive reuse of historic buildings, encourage the location of pedestrian-active uses on the ground floor, such as food service spaces, permit filing or records centers, government bookstores or other high volume activities. New buildings should be designed to promote pedestrian safety, interest and comfort." | M-13 |

Susana Montaña State Office Building DEIR Comments, 93.707E

- | | | |
|-----|--|------|
| | Please correct Objective 3 for Urban Design to state: "Preserve and enhance the design of buildings and their spatial relationship within the Civic Center." | M-14 |
| 42 | Please describe the lighting plan for the building, particularly street level lighting along pedestrian corridors to transit facilities. How would a "canopied recessed entrance arcade on Golden Gate Avenue" respond to Master Plan land use or urban design policies and objectives? | M-15 |
| 44 | It has not been demonstrated that the recessed arcade would address Objective 1, Policy 8 of the proposed Civic Center Plan. Increased winds on the tot lot does not address Objective 4, Policy 10 of the proposed Civic Center Plan. | M-16 |
| 71 | Please include a graphic illustration which shows the prevailing wind directions in the Civic Center area: Northwest, West-Northwest, West and West-Southwest. | M-17 |
| 74 | Please re-write the Impact D.1 paragraph regarding wind effects to clarify the impact with the project only, and the impact with the project and with other potential development. Do not try to combine those discussions within the same paragraph. Should the words ",with the project" at the end of the first sentence of this paragraph be deleted? It appears to be a typo. | M-18 |
| 216 | Please include the Asian Arts Museum as another project planned for the Civic Center. | M-19 |
| 218 | How is it determined that the indirect demand for 650 housing units in the City is not significant? This number of indirect housing impact has been found to be significant in the past. How is it not significant now, particularly when housing construction is very slow and hundreds of low-cost units are proposed to be lost to demolition? | M-20 |

cc: Barbara Sahm, Carol Roos, Planning Department OER
 Kevin Kaestner, State OPDM
 Civic Design Committee of the Art Commission

Letter M - Susana Montaña, Project Manager, Civic Center Study, San Francisco Planning Department, December 19, 1994

- M-1) The construction and improvement of state buildings such as the proposed New State Office Building in the Civic Center are not subject to local regulations and oversight (Hall v. Taft (1956) 47 C.2d 177, 183; City of Orange v. Valenti (1974) 37 C.A.3d 240, 244; Regents of University of California v. City of Santa Monica (1978) 77 C.A.3d 130, 136). Consistent with the State of California's sovereignty in connection with the construction and improvement of state buildings, "The State Architect has general charge, under the Department of General Services, of the erection of all state buildings and shall have an inspector assigned to each building during its construction" (Government Code §14951).
- M-2) The proposed canopy is discussed in Section III.B of the Draft EIR, Visual and Design Factors, among other locations, because it would be visible as an exterior element. As discussed in response to Comment F-2, p. 72 of this document, the design-build team has indicated that the proposed canopy is included as part of the project primarily as a means of reducing winds on the sidewalk in front of the building. Similarly, the design-build team states that the proposed arcade is also intended to serve as a wind-reduction measure, as stated in the response to Comment F-2, p. 73 of this document. Wind tunnel testing for the project, including the canopy, determined that winds on the Golden Gate Avenue sidewalk, near the proposed entrance to the New State Office Building, currently exceed the hazard criterion and would diminish with the project plus potential development such that the hazard criterion were no longer exceeded. Winds on Golden Gate Avenue would still be strong. (See Figure B-1 and Tables B-1 and B-2 in Appendix B of the Draft EIR, pp. A-35 - A-37.) Wind tunnel testing did not include wind measurements within the proposed arcade, as the testing is intended to analyze effects on sidewalk winds. As stated in response to Comment F-2, p. 73 of this document, the arcade would be expected to provide additional protection from winds to persons inside the arcade.

Regarding the proposed project's relation to Policy 8, please see the response to Comment F-2, p. 72 of this document.

- M-3) As stated in the response to Comment F-2, p. 72 of this document, the proposed canopy and arcade would both be lighted in the evening hours. According to the design-build

team, the project lighting plan would focus attention on the historic California State Building and provide a secure street environment. On McAllister Street, facing Civic Center Plaza, only the California State Building, and not the taller south wall of the New State Office Building, would be lighted from the exterior. The two glass-enclosed atria (the second vertical element described on Draft EIR p. 7) would be lighted from the interior, visually opening these spaces onto Polk and Larkin Streets and providing light to the sidewalk as well. All canopies and entrances would also be lighted, and street lighting would be provided where the sidewalk surrounding the project cannot be lighted by sources on or in the building.⁵ The state does not propose installation of sidewalk lighting between the project site and BART/MUNI Metro stations. Regarding lighting and its potential effect on travel modes, the transportation analysis included in the Draft EIR assigned trips to travel modes, including transit, based on existing survey data of state employees, as stated on p. 128 of the Draft EIR, including employees currently at the existing Annex at 455 Golden Gate Avenue. This mode split would be expected to continue regardless of improvements to sidewalk lighting.

- M-4) As noted in the responses to Comment M-2, above, and to Comment F-2, p. 72 of this document, the design-build team has stated the proposed arcade is intended to serve as a wind-reduction measure; as stated in the response to Comment F-2, the arcade also would contain ramps, in compliance with the Americans with Disabilities Act, that would allow wheelchair users to enter the Golden Gate Avenue side of the New State Office Building. The arcade also would serve as a grand entrance to the New State Office Building, as described in response to Comment F-2. The arcade would be lighted, along with the proposed canopy, as described in the responses to Comment M-3 and to Comment F-2. Additional detail is not available at the current level of design.
- M-5) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. S-6 regarding the status of United Nations Plaza relative to the Sunlight Ordinance (Section 295 of the City Planning Code).
- M-6) As stated in the response to Comment M-2, above, both the canopy and the arcade are included in the project design to reduce winds. Wind tunnel testing for the EIR included

⁵ Hartman, Craig W., AIA, Skidmore Owings & Merrill, letter to Art Thompson, Hines Interests Limited Partnership, January 19, 1995.

the proposed canopy as part of the project; no testing was performed of the proposed New State Office Building absent the canopy. As stated in the response to Comment M-2, wind tunnel testing did not include wind measurement within the proposed arcade.

- M-7) The arcade is illustrated in Figure 9, p. 15 of the Draft EIR. The canopy is an exterior element and thus is not illustrated in the floor plans shown in Figures 7 to 15. The canopy is illustrated in Figures 3, 4 and 6, pp. 9, 10 and 12, and in Figure 26, p. 59. As noted in the response to Comment M-4, above, additional detail is not available at the current level of design.
- M-8) Please see the response to Comment M-1, above.
- M-9) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 35 to add Policy 5.
- M-10) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 35 to add Policy 6.
- M-11) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 35 to add Policy 8. (Policy 10 of Objective 4 of the Urban Design Element relates specifically to "private development" and is therefore not added to the Draft EIR text.)
- M-12) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 36 to account for the publication of the referenced document.
- M-13) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 38 to add Policy 8. Please see also the response to Comment F-2, p. 72 of this document.
- M-14) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 37 to correct the wording of Objective 3.
- M-15) The project lighting plan is described in the response to Comment M-3, above.

Regarding the street-level portion of the Golden Gate Avenue facade, the project would respond, in part, to Objective 3 of the Urban Design Element, "moderation of major new development to complement the city pattern, the resources to be conserved and the neighborhood environment," by providing high-quality urban design (Policy 3) and by incorporating architectural measures, such as the proposed canopy to reduce ground-

level wind, thus recognizing the special urban design problems posed by development of large properties (Policy 7). The project would respond, in part, to Objective 4, "improvement of the neighborhood environment to increase personal safety, comfort, pride and opportunity," by providing adequate lighting and supporting a more secure pedestrian environment with on-site State Police and private security (Policies 3 and 4), by providing local-serving state agencies with space on the ground floor (Policy 6), and by installing and maintaining landscaping on the periphery of the building (Policy 12). Please see also the response to Comment F-2, p. 72 of this document.

The *San Francisco Master Plan* contains numerous objectives and policies some of which may come into conflict. While the proposed project is exempt from the provisions of the *Master Plan*, it should be noted that, in the case of a project subject to review by the City of San Francisco, the City Planning Commission or Department of City Planning, in making a determination about project consistency with the *Master Plan*, must balance conflicting objectives and policies to achieve the project that, overall, best meets the goals of the *Master Plan*. Therefore, individual project elements may not respond to individual *Master Plan* policies, even in a project that is generally responsive to the Master Plan. As stated on Draft EIR p. 33, the project would not be subject to San Francisco plans and codes, including the *Master Plan*.

- M-16) Regarding the proposed project's relation to Policy 8, please see the response to Comment F-2, p. 72 of this document.

Regarding the Civic Center Tot Lot, the referenced Policy 10, quoted on p. 38 of the Draft EIR, states, "Maximize sun exposure to public places and open spaces and protect these spaces from unpleasant winds." While the proposed project would not affect sunlight on Civic Center Plaza, it would increase winds in the northeast corner of the Plaza, where the tot lot is located, by 7 miles per hour, as stated on p. 77 of the Draft EIR. This would not respond to Policy 10 of the proposed Civic Center Plan. (Refer to Figure B-1, p. A-35, and Table B-1, p. A-36, in Appendix B of the Draft EIR, where test point 31 is at the location of the Civic Center Tot Lot. As indicated in Table B-1, wind speeds at test point 31 currently meets the seating area criterion. With the project (and the project plus potential development), wind speeds at test point 31 would exceed the pedestrian comfort criterion.

- M-17) As stated on p. 71 of the Draft EIR (and noted by the commenter), four directions comprise the greatest frequency of occurrence as well as the majority of strong wind occurrences; these are the northwest, west-northwest, west and west-southwest. Together, they make up about 61 percent of daytime winds, as stated in Appendix B of the Draft EIR, on p. A-29. West winds are winds blowing from the west, or roughly along Golden Gate Avenue from Van Ness Avenue towards the project site. Northwest winds are winds from the northwest, or roughly diagonally from Van Ness Avenue and Turk Street to the project site. West-northwest winds follow a path between West and Northwest winds, while west-southwest winds roughly follow a path from Van Ness Avenue and McAllister Street to the project site. Illustration of wind directions is not required. A North Arrow is provided for Figure 4 (Project Location) and other figures throughout the Draft EIR.
- M-18) Impact D.1, Draft EIR p. 74, summarizes the overall wind impact of the project and of the project plus potential development. The text following this impact statement provides a complete discussion of wind effects, including those of the project (pp. 75-77) and those of the project plus potential development (pp. 77-78). The words "with the project" at the end of the first sentence of Impact D.1 are redundant. The commenter requests editorial changes, which do not affect the substance of the Draft EIR.
- M-19) The Asian Art Museum is discussed on Draft EIR p. 32, as updated in this Final EIR Addendum to account for voter approval of a bond measure to seismically upgrade the existing main library building for the Asian Art Museum. Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 216, adding the Asian Art Museum to the projects listed in Section III.L, Cumulative Impacts.
- M-20) As stated on p. 211 of the Draft EIR, the project would not directly affect employment or housing demand because the project would relocate existing state employees from other work sites in San Francisco. As stated on Draft EIR pp. 212-213, the project could, indirectly, increase employment, population, and housing demand in San Francisco because office space currently occupied by state workers would become vacant upon relocation of those workers to the project site, potentially allowing for "backfill" with office space that could create new jobs. Given the decline in Downtown employment described on p. 212, it is not certain that office space vacated by state offices moving to the proposed New State Office Building would result in new employment in the near term. Re-occupancy of office space vacated by the state would be subject to economic

and social factors not related to the project. For example, the vacated office space could be filled by existing tenants relocating from other, less suitable space, or it could "replace" planned new construction or expansion of office space elsewhere in San Francisco. Further, while employment has declined in San Francisco since 1990, the number of housing units has increased, as stated on Draft EIR p. 209. Given the significance criteria identified on p. 210, even if office space vacated by the state were re-occupied by new employees, the project would not "contribute substantially to a cumulative, regional jobs/housing imbalance," and would therefore not have a significant project-specific or cumulative effect on population, employment or housing.



SAN FRANCISCO ART COMMISSION

December 20, 1994

RECEIVED

DEC 21 1994

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

PROGRAMS

Christal Waters, Senior Environmental Planner
California Department of General Services
Office of Project Development and Management
400 R Street
Sacramento, CA 94814

RECEIVED

DEC 21 1994

CITY & COUNTY OF S.F.
DEPT OF CITY PLANNING

RE: Project No. OPDM 0457: State of California Civic
Complex, San Francisco New State Office Building

STREET ARTISTS LICENSES
SUITE 70
415.252.2581

Dear Ms. Waters:

ART COMMISSION GALLERY
125 GROVE STREET
415 334.9682

Enclosed please find comments to the Draft EIR of the San Francisco New State Office Building. These comments are from the Civic Design Review Committee of the San Francisco Art Commission meeting date December 19, 1994. Commissioners Rod Freebairn-Smith, William Meyer, and Anne Healy were in attendance.

General Statement:

Overall, the Commissioners of the Civic Design Review Committee approve the general direction of the project that the State of California has identified as the preferred alternative. The State and project architects have shown appropriate sensitivity to the adaptive re-use of the historically significant California State Building on McAllister Street and its importance to the architecture of the Civic Center. The Art Commission recognizes that the Landmarks Commission has reviewed that section of the EIR which addresses the California State Building, and we accept their review of this portion of the EIR. Comments from the Art Commission regarding the building design which are not part of the EIR process will be forwarded to the State in a separate letter.

Comments on Environmental Factors:

III. Environmental Setting, Impacts and Mitigation

B. Visual and Design Factors

Comment: From the Civic Center, the view of the Philip Burton Federal Building will be screened in a positive manner. The height and width of the north facade of the New State Office Building, however, as it faces Golden Gate Avenue and the plaza of the Philip Burton Federal Building will create a massive visual "valley" on Golden Gate Avenue between Polk and Larkin Streets.

N-1



CITY AND COUNTY OF
SAN FRANCISCO

Recommendation: Tapering or stepping back the top few floors on the north facade of the New State Office Building as well as the northwest and northeast corner of the building at each floor will reduce the apparent size of the north facade. (see notes on Figs 3.5.6.15 attached)

Comment: The intent of the canopy on the north facade of the New State Office Building as a means to reduce the impact of the visual mass on Golden Gate Avenue does not succeed.
Recommendation: The size, purpose and location of the canopy should be studied further.

N-2

Comment: The south facade of the California State Building is dominated by the south facade of the New State Office Building.

Recommendation: The New State Office Building should not overpower the historical California State Building. By increasing the contrast between the California State Building and the New State Office Building the impact should be decreased. The New State Office Building south facade should have more subtle differentiation between opaque and transparent portions of its facade. Smaller fenestration depths should also be considered. These approaches may increase the contrast with the stone rustication and deep fenestration of the California State Building.

N-3

C. Solar Access and Shading

Comment: The height and width of the north facade of the New State Office Building as it faces Golden Gate Avenue and the plaza on the south side of the Philip Burton Federal Building causes substantial new shading of the Federal Building plaza during the spring and fall seasons. (see Draft EIR figure 28, p. 64)

N-4

Recommendation: Tapering or stepping back the top few floors on the north facade of the New State Office Building as well as the northeast and northwest corners of the building in plan, as suggested earlier under "Visual Impacts", will decrease by a significant amount the new shading on the Federal Building plaza. (see notes on Figs. 3, 5, 6 and 15 attached)

D. Wind

Comment: The wind study is considered to be inadequate, and additional study should occur.

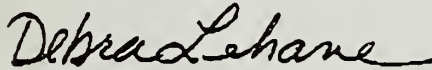
Recommendation: Architectural solutions should be considered to mitigate the wind problems. Solutions should be considered which will mitigate the negative wind factors in the Philip Burton Federal building plaza which fronts onto the Golden Gate Avenue facade of the New State Office Building, and along the Golden Gate Avenue, Polk and Larkin Street corridors. Additional study and information needs to be presented concerning the canopy and its effect as a wind mitigation measure. It is unclear how the canopy will mitigate severe wind factors.

N-5

The unusually threatening winds in the Philip Burton Federal Building plaza suggest that a joint approach to wind speed reductions could be profitably undertaken if the State and

Federal owners would collaborate with the City of San Francisco on major new wind mitigations. Both buildings would potentially be improved.

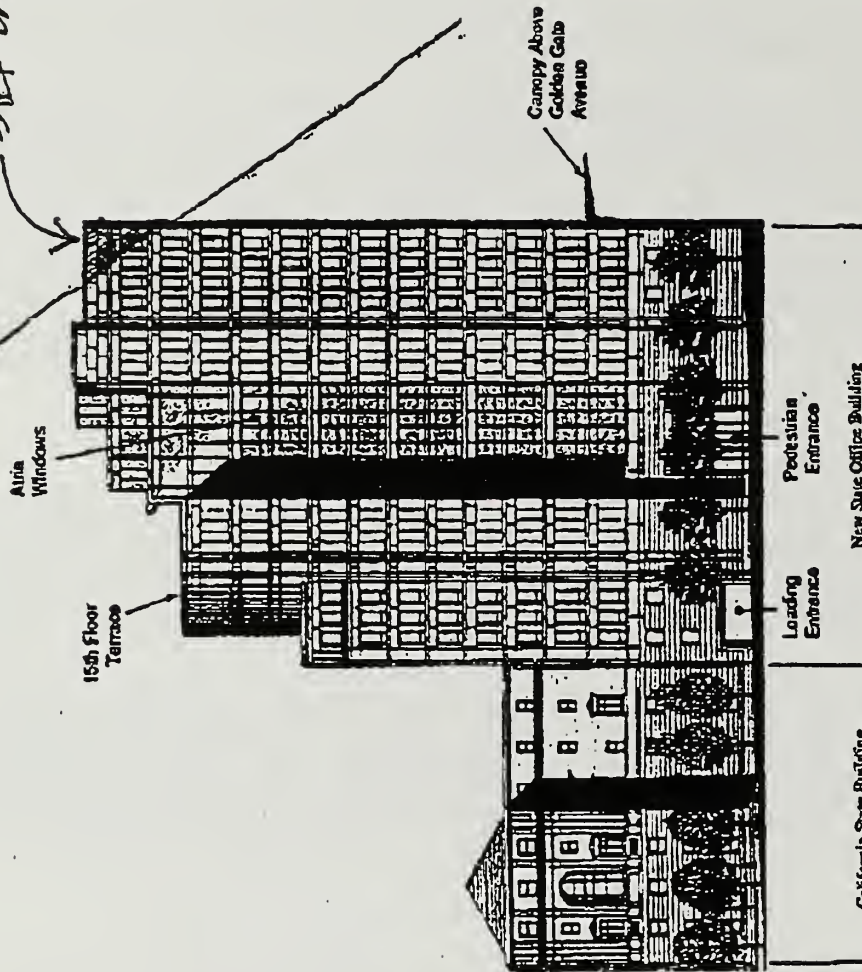
Sincerely,



Debra Lehane
Civic Design Review Coordinator

attached

STEP BACK

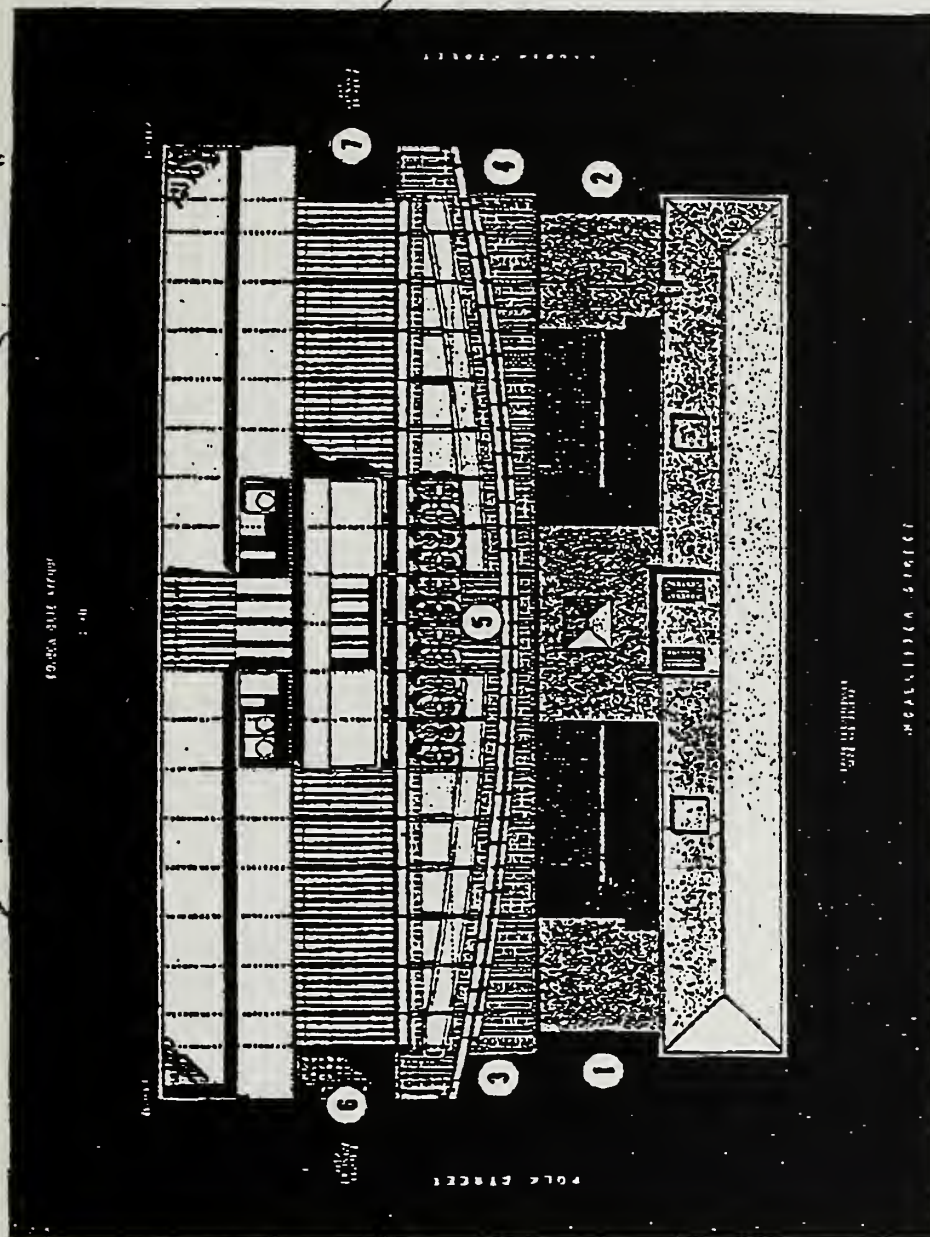


State Office Building East

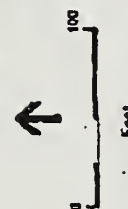
Figure 3

Larkin Street (East) Elevation

SOURCE: SHoP Architects, Owing & Merrill
ESH Design Build, Inc.

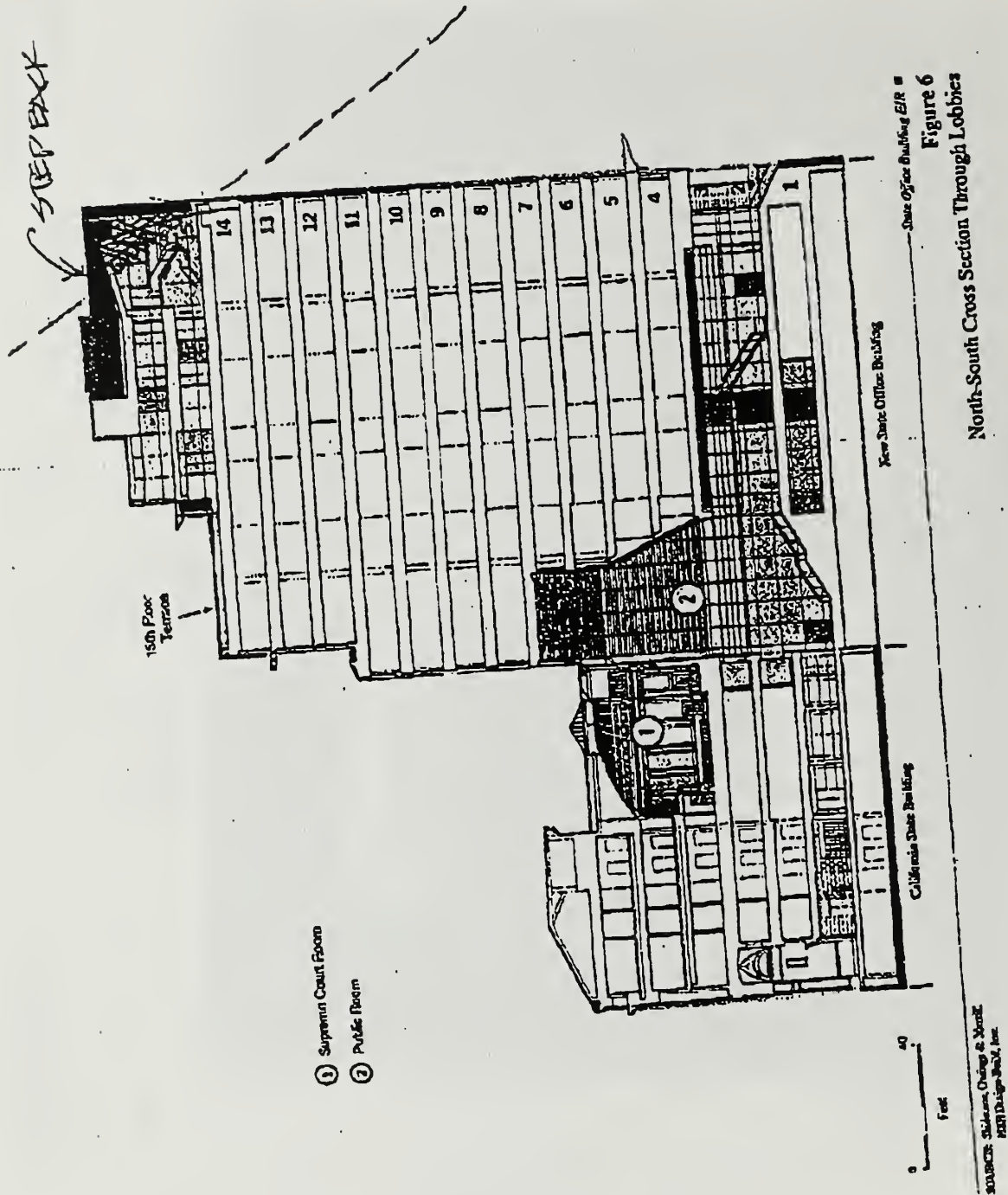


- ① West Garden
- ② East Garden
- ③ Parking Entrance
- ④ Loading Entrance
- ⑤ 15th Floor Terrace
- ⑥ West Courtyard
- ⑦ East Courtyard

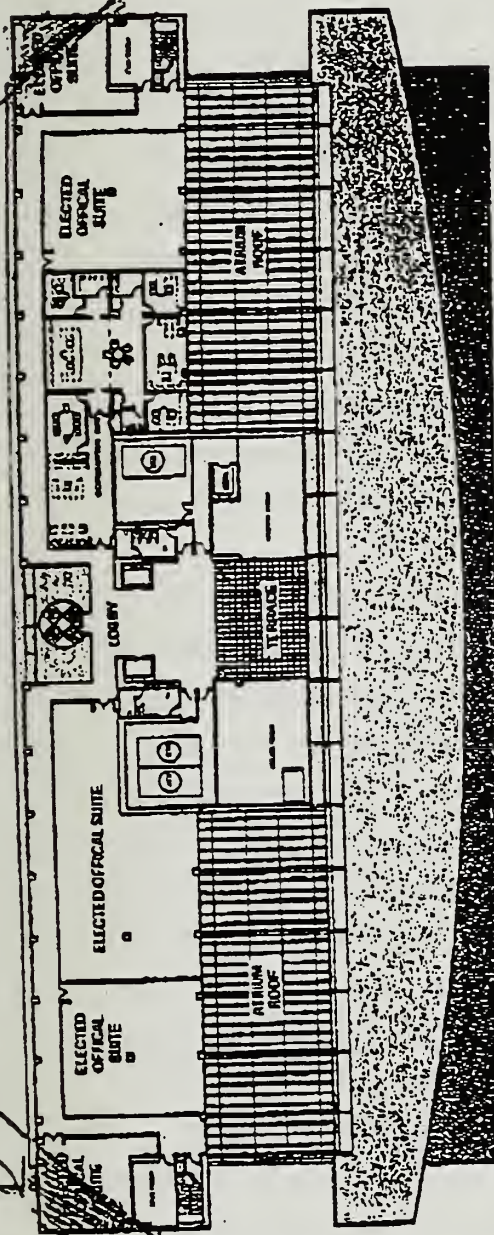


SOURCE: Richmond, Oviatt & Merrill
RSM Design-Build, Inc.

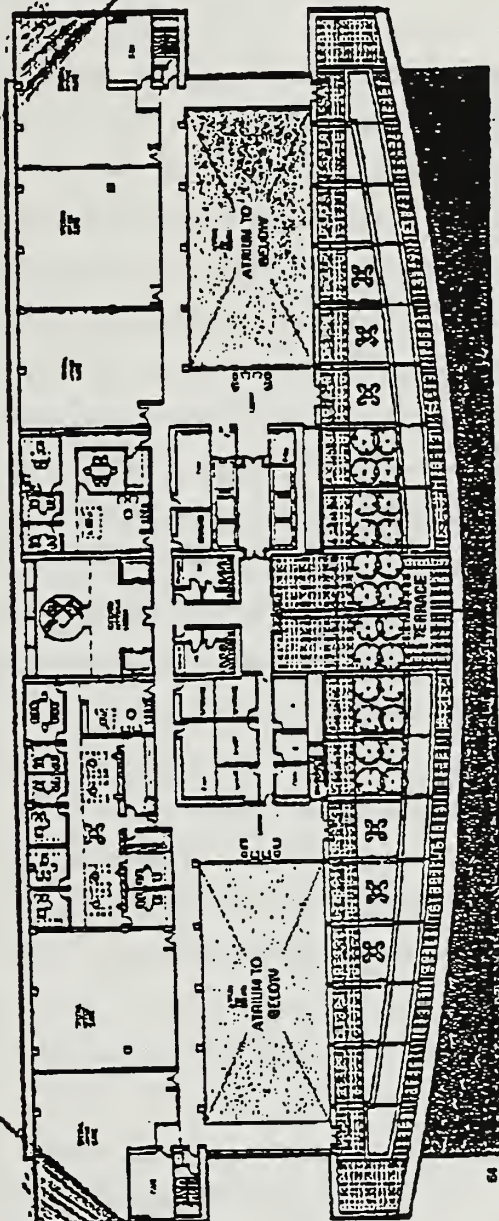
State Office Building EIR
Figure 5
Site Plan



STEP BACK



Level 16



Level 15

Feet

SOURCE: Alderson, Oring & Merrill
FISH Design-Build Inc.

State Office Building ER

Figure 15

Level 15 and Level 16

New State Office Building

III. Written Comments and Responses

Letter N - Debra Lehane, Civic Design Review Coordinator, San Francisco Art Commission,
December 20, 1994

- N-1) The comment addresses the project design, and not the adequacy of the EIR. The Draft EIR describes impacts related to visual and design factors on pp. 51 to 60, and illustrates the relationship along Golden Gate Avenue between the proposed New State Office Building and the existing Federal Building in Figure 26, p. 59. The Draft EIR also states, on p. 51, that judgments of visual compatibility are to some extent subjective. Based on the visual relationship between proposed New State Office Building and the existing visual setting as a whole, including the Federal Building and other existing buildings and features, the Draft EIR concludes that effects related to visual and design factors would not be significant. Please see also the response to Comment C-1, p. 52 of this document, for additional discussion of Urban Design and Visual Quality.
- N-2) The comment addresses the project design, and not the adequacy of the EIR. No additional response is required. For information, according to the design-build team, the canopy on the Golden Gate Avenue frontage of the proposed New State Office Building is included in the project design primarily as a means to reduce ground-level wind effects on the building's north side. The design-build team also indicates that the canopy is a "strong public gesture" that would link the proposed project to the Federal Building plaza across Golden Gate Avenue.⁶ Please see also the response to Comment F-2, p. 72 of this document, regarding the canopy.
- N-3) The comment addresses the project design, and not the adequacy of the EIR. The Draft EIR illustrates the contrast between the proposed New State Office Building and the existing California State Building in Figure 24, p. 57. As stated in the Draft EIR on p. S-3, the facades of the New State Office Building are "intended to be a contemporary design compatible with the California State Building," with similar exterior granite cladding proposed. As described on p. 52 and illustrated in Figure 24, the fenestration of the two buildings would be of different patterns, and the south facade of the New State Office Building would include a series of horizontal elements, while the south facade of the California State Building is characterized by a pattern of large and small window opening, including alternating two-story arched, inset windows. The south facade of the

⁶ Hartman, Craig W., AIA, Skidmore Owings & Merrill, letter to Art Thompson, Hines Interests Limited Partnership, January 19, 1995.

New State Office Building would feature a curved facade, visible primarily between the 12th and 14th floors; this element also would be in contrast to the California State Building. Please see also the response to Comment C-1, p. 48 of this document, regarding the relationship of the proposed New State Office Building to the historic California State Building.

- N-4) The EIR describes shadow impacts of the proposed project in Section III.C, pp. 61-70, including Figures 27-29, pp. 63-65, which illustrate shadow effects at 10:00 a.m., 12 noon and 3:00 p.m. on the winter and summer solstices and on the spring and fall equinoxes. As stated on p. 67 of the Draft EIR, shadow effects of the proposed project would not be significant because the Federal Building plaza would be expected to have limited use. The commenter correctly notes that tapering of the corners of the proposed New State Office Building would reduce project shadow on the Federal Building plaza. Of the times illustrated in Figure 28, which shows shadow effects on March 21, the effect would be most pronounced at 10:00 a.m. and 3:00 p.m. At noon, the tapered corners would have virtually no effect, assuming that the proposed New State Office Building were to retain its full-block width over a portion of the tallest element, as shown in the commenter's markup of Figures 5 and 15. Stepping back the top of the Golden Gate Avenue facade would reduce shadow even at noon in March. The greatest effect would be on the portion of the Federal Building plaza closest to that building's Golden Gate Avenue entrance, including, possibly, the entrance steps. Tapering or stepping back the building would reduce the project's less-than-significant shadow effects. The suggested modifications would reduce the square footage in the building program, reducing the ability of the program to meet project objectives.
- N-5) The wind analysis in the Draft EIR is not inadequate. As stated on p. 74, the EIR analysis is based on a two-step testing process in which generalized building masses were first tested for their wind effects prior to the preparation of and designs for the proposed New State Office Building. The results of the first-phase testing, which tested simple models of varying bulk, were provided to the design-build teams for use in development of building designs. Following the completion of the first-phase testing, the current building design was created, incorporating a canopy on the Golden Gate Avenue frontage. According to the design-build team, the canopy was included in the project design primarily as a means of moderating ground-level winds along the Golden

Gate Avenue sidewalk.⁷ The EIR (second phase) wind-tunnel testing, which tested the project as proposed, confirmed that the proposed canopy would reduce ground-level winds on the north side of the building.

As stated on p. 73 of the Draft EIR, the existing Philip Burton Federal Building appears to control the wind environment in its vicinity, including the project site. The proposed New State Office Building would contribute to, but would not control, the wind environment in the vicinity of the Federal Building. The first-phase wind analysis recommended several options to the project design-build teams for reducing the wind effect of the proposed New State Office Building, including the incorporation of setbacks above approximately 40 to 60 feet in height (see p. A-41 of the Draft EIR). However, wind-tunnel testing provides no indication that the New State Office Building could substantially reduce overall ground-level winds in the vicinity that result from the presence of the existing Federal Building. The proposed canopy was selected as an alternative means of reducing ground-level winds, because a setback would force the New State Office Building mass closer to the existing California State Building, potentially adversely affecting the historic building.

Finally, it should be noted that the comment assumes that the project would have adverse effects on winds in the Federal Building plaza. In fact, the opposite is true. Of seven test points in and around the plaza (1, 5, 8, 10, 36, 44, 45), pedestrian wind speeds would decrease from existing conditions at six points with the project, and with the project plus potential development. (See Figure B-1, p. A-35, and Table B-1, p. A-36, in Appendix B of the Draft EIR.) At two points in and around the Federal Building plaza (test points 5 and 8), wind speeds that currently exceed the hazard criterion would drop below that criterion; two other points that currently exceed the hazard criterion (test points 1 and 44) would continue to do so with the project and with the project plus potential development. With both the project and the project plus potential development, the number of hours during which wind speeds at those two points would exceed the hazard criterion would decrease by between 41 percent and 52 percent.

⁷ Hartman, Craig W., AIA, Skidmore Owings & Merrill, letter to Art Thompson, Hines Interests Limited Partnership, January 19, 1995.

MEMORANDUM

Date: December 20, 1994
To: Barbara Sahm, OER
From: Yvonne Gibson, Associate Transportation Planner
Subj: Review of Draft EIR, Transportation Impacts



A review of the transportation portions of the subject Draft EIR has been completed. The following comments are offered for your consideration in developing a joint City submittal of comments to the State.

General Comments

We concur with the comments provided by the Department of Parking and Traffic (DPT) dated December 16, 1994. The comments in this memo are in addition to the DPT comments. The DPT comments should be considered with this memo for a more complete review of the Draft EIR.

Setting

Page 122, second paragraph: The Central Freeway discussion needs to be updated to reflect recent decisions to initiate a second phase of the Central Freeway Study. The objective of Phase II is to provide a comprehensive planning effort for selecting a locally preferred alternative by July 1, 1995.

O-1

Page 126, second paragraph: Existing on-site parking should be addressed.

O-2

Project Travel Demand Analysis

Appendix C, P. A-55: As previously discussed, the visitor trip rate is considered to be low. The survey conducted appears only to have estimated appointment based trips and those associated with the Franchise Tax Board, and did not consider a factor for "drop in" visitors, and other visitors trips. Therefore, the estimated number of visitor trips is considered to be low.

O-3

Transportation Impacts

Page 132, fifth paragraph: The second sentence is confusing and unclear. The amount of existing on-site parking should be quantified including bicycle and parking for persons with disabilities.

O-4

Page 133, fifth paragraph: What other sources of parking demand were considered for projecting future parking demand?

O-5

Page 134, third paragraph: Reasons for not supplying parking for the disabled and bicycles should be stated.	O-6
Page 135, third paragraph: Pedestrian safety (including amenities such as lighting and ways to prevent jaywalking) needs to be discussed.	O-7
Page 138, fourth paragraph: The location, number and sizes of freight loading and delivery areas should be specified. Any on-street, double parked loading areas should also be identified.	O-8
Page 146, beginning in the second paragraph: This discussion is based on 1989 pre-earthquake conditions and needs to be updated to reflect conditions as they currently exist. One source of this update could be the Draft Transportation Technical Report for the "Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure," dated September 22, 1994.	O-9

cc: Carol Roos, OER
Bill Wycko, DCP

Letter O - Yvonne Gibson, Associate Transportation Planner, San Francisco Planning Department, December 20, 1994

- O-1) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 122 to update the discussion of the Central Freeway study, and for the addition of Endnote 3a on p. 150.
- O-2) Please see Chapter II, Revisions to the Draft EIR, for a revision to p. 126 to quantify existing on-site parking, including parking for disabled persons and bicycle parking.
- O-3) As described in Appendix C, p. A-55 of the Draft EIR, state agencies proposed to occupy the project provided data on the level of daily visitor activity generated at their office(s). The information was not limited to appointment-based trips and those associated with the Franchise Tax Board, but rather reflected *all* visitor activity (i.e., by appointment, and for "drop-in"). As also stated in Appendix C, the state agencies at the project site would not be expected to attract high levels of visitors, except for higher visitor levels at the Franchise Tax Board before the April income tax filing deadline. The visitor trip rate used for the analysis is therefore considered to be representative of average visitor activity for the project as a whole.
- O-4) Please see Chapter II, Revisions to the Draft EIR, for an addition to p. 132 to quantify existing on-site parking. As noted on p. 132, the analysis conservatively assumes no net loss of on-site parking with the project. Please see Chapter II, Revisions to the Draft EIR, for an addition to p. 126 to discuss existing on-site parking for disabled persons and bicycle parking.
- O-5) As stated on pp. 133 and 134 of the Draft EIR, future parking demand in the project area was estimated for the project (using estimated project-generated vehicle traffic) and for cumulative development (adding parking demand estimates for the project and the New Main Library on top of a growth factor [the same growth factor used for traffic projections]).
- O-6) As stated on p. 134 of the Draft EIR, the project proposes to provide up to 75 on-site parking spaces for the use of judges and state officials, and would provide five motorcycle spaces and ten bicycle spaces. As stated in response to Comment K-6, p. 107 of this document, bicycle parking for employees would be in an enclosed area. Opportunities for providing public bicycle parking would be evaluated during design

development. Parking for disabled drivers would be provided in compliance with the Americans with Disabilities Act and all applicable State laws and regulations.

- O-7) Please see Chapter II, Revisions to the Draft EIR, for an addition to p. 135 regarding jaywalking on Golden Gate Avenue. Regarding lighting, please see the response to Comment M-3, p. 118 of this document.
- O-8) Proposed loading spaces are illustrated in the Draft EIR in Figure 8 (Level 1), p. 14. As shown, the loading dock would be located on the Larkin Street side of the New State Office Building, mid-block, near where the new building and existing California State Building would meet. Proposed loading docks have been sized based on the historic and projected use of such space. No on-street double-parking for loading is anticipated during project operation. Additional detail on loading design would be developed in further project planning.
- O-9) The comment addresses traffic conditions in the cumulative (future) context. The emphasis of the *Terminal Separator Structure / Mid-Embarcadero Preliminary Transportation Study* referenced by the commenter was to examine the relative pros and cons of six alternative treatments for The Embarcadero roadway and the Terminal Separator Structure (TSS) in terms of intersection and ramp operations in year 2015; a preferred alternative was not identified. (Note that the study referenced by the commenter and discussed above was published in draft form in September 1993 [not 1994, as stated by the commenter] and the final study, in January 1994.) The discussion on pp. 141 to 148 of the Draft EIR provides the reader with a cumulative context of future transportation conditions, as projected by the most recent comprehensive analyses conducted for San Francisco (*i.e.*, the *Mission Bay EIR* and the *South of Market EIR*), within which the proposed project would exist. This discussion is typically included in EIRs prepared for projects in San Francisco, and acknowledges the 1989 Loma Prieta earthquake (see pp. 140 and 147 of the Draft EIR). In the years since the publication of the *Mission Bay* and *South of Market EIRs*, traffic conditions have evolved in the City as repairs continue on some of the earthquake-damaged roadways (*e.g.*, I-280). Likewise, predictions of future traffic conditions have evolved as repair options for other earthquake-damaged roadways (*e.g.*, the TSS and the Central Freeway) are studied by the City and Caltrans.

For purposes of this EIR, however, it is judged that the cumulative context discussion in the Draft EIR remains basically representative of future traffic conditions, and that in the absence of a final decision regarding the TSS/Mid-Embarcadero alternatives, text revisions to the Draft EIR are not warranted at this time.

21 December 1994

Comments on the DEIR for
CALIFORNIA SAN FRANCISCO CIVIC CENTER COMPLEX

Submitted by Edward N. Michael (415) 776-0664
828 Franklin Street #506
San Francisco, CA 94102

My comments are largely confined to Visual and Design Factors with some few directed to editorial corrections. Page & paragraph numbers are given to avoid having to repeat them in their entirety. A paragraph is numbered by counting with the first one or portion thereof on a page even though it may be a continuation of one from a preceding page.

- | | | |
|----------------------|---|-----|
| Page S-2:4 & S-3:all | I found much confusion in the description of the elements of the building and wasn't helped by turning to Fig 14 on page 20 where both floor plans are labeled Typical Low Rise 7-11. | P-1 |
| S-3:2&3 | The new building would be built up to the property line along Golden Gate and a canopy 22-feet deep would project for most of its length. The sidewalk depth at this point is on 12 or 13 feet, thus the canopy would be projecting nine or 10 feet into the right-of-way. This encroachment should be clearly stated and not require the reader to determine it by deduction. I doubt that the city would allow a private developer this encroachment. | P-2 |
| S-5:2 | At this writing, the California State Building is no longer visible from Market, Hyde, Grove & Eight Streets. | P-3 |
| S-5:4 | The city Hall Dome ... would continue as <u>a</u> major visual landmark in the Civic Center. The word <u>a</u> should be changed to <u>the</u> for it is the most inescapable feature of the Civic Center Complex. | P-4 |
| S-6:2 | Visual effects of the project would not be significant. I don't see how that conclusion can be reached. Its sheer bulk alone irrespective of whatever treatment - good or bad - makes it significant. Imagine, if you will, the south half of the Civic Auditorium being demolished and replaced with a structure of this magnitude -- exactly the same thing that is happening here. I cannot envision the result of that as anything other than a significant change. | P-5 |

(I emphasize that I am not opposed to an addition of this size to the old state building; I am opposed to the way it is being done, i.e., the facade treatment.)

The proposed structure is going to conceal a good portion of the blank obtrusive facade of the Burton Federal Building. But it's doing that by erecting a 209-foot building 340 feet closer to the Civic Center Plaza. Is the articulation of that new facade such that it will be compatible with the Beaux Arts buildings it intrudes upon. ~~I don't want~~ ^{success} a Beaux Art building 209 tall; what is needed here is one that contributes to the ensemble in ways more than color and type of materials.

Another problem will result from the fact that the ^{facade of} Federal Building and the new state one both terminate in unrelieved, parallel, horizontal lines. This gives added emphasis to both. The introduction of some relief should be found in the state building. The ~~done of~~ ^{facade of} City Hall as previously stated is the most profound architectural statement in the Civic Center. Its curved ~~shape~~ is repeated in some form of window or door treatment in every major building shown in the 1912 Civic Center plan and also in the later War Memorial complex and Federal Building --- with one exception. That is the new Main Library as now seen. But perhaps there's a surprise waiting for us when that building is uncrated.

I'm unsure of the intent of the curved portion of the facade. (It may be the City's largest bay window .) Its curve is so subtle that some viewers will question whether or not it's merely an optical illusion.

I am ill at ease with the project, not because it's bad and totally insensitive to its location but rather because I find so very little that relates positively to the location. I offer no specific changes to its south facade but rather would encourage a reevaluation of ~~it~~ ^{the entire design} taking into consideration light and shadow effects. (For this take a look at ~~a rather simple building at~~ 720 Market St. It's fairly recent but strongly reflects the best features of its ^{surrounding} neighbors. Additionally, a look at older major highrise buildings in the downtown would reveal that the best of them frequently terminated their straight-forward facades with arches and/or other embellishments in the uppermost floors. (PG&E, Matson, Flood, Phelan, Palace Hotel, Roos, and the corbeling in Standard Oil at 225 Bush and the former Masonic Temple at Van Ness and Market.

No where does the new State office Building even hint that it has a visual relationship ^{with} the Beaux Arts ensemble. It could be an addition to any building any place.

P-5
cont'd.

51:3 Impact B.1. While I recognize the subjectivity of comments on design I object to the finding that the changes are "Not Significant". (I ~~would~~^{maintain} ~~also agree~~, that it could be possible to have significant changes that would be all to the good, if done with sensitivity to the location.) P-6

84: History of the Civic Center. I am not aware that the Board of Supervisors ever approved B.J.S Cahill's plan (the only one of which I've ever seen is from 1899) in 1912. That plan bears absolutely no, I repeat, no, resemblance to the adopted plan of 1912. Nor for that matter was there much, if any, comparison with Burnham's except both were dealing with the old City Hall. Please ~~site~~^{cite} a reference for the proposition that the Board approved Cahill's plan and where this plan can be seen. P-7

*Sorry about the 1912 appearance of the 1912 plan.
The much more recent 1912 plan is the one.*

Σ N M

Letter P - Edward N. Michael, December 21, 1994

- P-1) The comment cites the Draft EIR Summary project description. A more complete description of the proposed New State Office Building is provided in Chapter II, Project Description, pp. 7-24, including Figures 2 through 15. In Figure 14, p. 20 of the Draft EIR, the upper graphic should be labeled, "Typical Low Rise Plan Levels 12-14," not "Levels 7-11."
- P-2) As noted by the commenter, the proposed canopy would project over the curb lane of Golden Gate Avenue, encroaching approximately 10 feet into the street right-of-way, or approximately the same distance as the canopy at the California Culinary Academy Building on Polk Street at Turk Street. As stated on pp. 33-34 of the Draft EIR, the proposed project would not be formally subject to City of San Francisco plans and codes. Please see Chapter II, Revisions to the Draft EIR, for additions to p. S-3 and p. 22 of the Draft EIR text to clarify the description of the proposed canopy. As noted on p. 33 of the Draft EIR, the state is not subject to local regulations. Please see the response to Comment M-1, p. 118 of this document, for additional information on this subject.
- P-3) The commenter is correct; construction of the New Main Library has obscured the view of the California State Building from the Market, Hyde, Grove, and Eighth Streets intersection. Please see Chapter II, Revisions to the Draft EIR for a revision to p. S-5 of the Draft EIR text to correct the discussion of the view from Eighth and Market.
- P-4) Comment noted. The Draft EIR conservatively states that the City Hall dome would remain a major visual landmark in the Civic Center following construction of the project. (The same text appears on p. 52 of the Draft EIR.)
- P-5) The Draft EIR describes impacts related to visual and design factors on pp. 51 to 60, and states, on p. 51, that judgments of visual compatibility are to some extent subjective. Based on the visual relationship between the proposed New State Office Building and the existing visual setting as a whole, including the Federal Building and other existing buildings and features, the Draft EIR concludes that the project would not result in a substantial adverse change in regard to visual and design factors and that the effects, therefore, would not be significant under CEQA. Please see also the response to Comment C-1, p. 48 of this document, regarding visual effects (beginning on p. 52).

III. Written Comments and Responses

Regarding the comment about Civic Auditorium, it should be noted that the building would replace a building constructed in the 1950s and, while it would be physically connected to the historic California State Building, it would be a separate structure. Thus the New State Office Building would not be the equivalent of re-constructing the south half of the Civic Auditorium in a much larger scale.

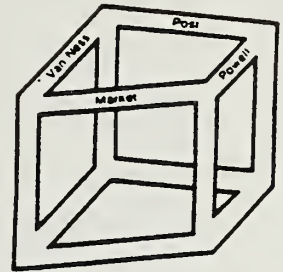
- P-6) This comment, regarding the analysis of visual and design factors, addresses the same issue as raised in Comment P-5, which makes reference to the Summary chapter discussion of the same topic.
- P-7) The comment refers to the discussion of an "overall plan for the Civic Center" approved by the Board of Supervisors in 1912, and based on a plan drawn up by Bernard J.S. Cahill, as described on Draft EIR p. 84. It was not Cahill's original 1899 plan, but his revised 1909 plan (based on his 1904 plan prepared at the request of the Society for the Improvement and Adornment of San Francisco) that was the basis for the 1912 Civic Center Plan. Daniel Burnham's competing plan of 1905 involved a series of grand boulevards. It, too, was revised following the 1906 earthquake (by Burnham associate Willis Polk), but was rejected by the voters. Please refer to the "National Register of Historic Places, Inventory-Nomination Form for Civic Center Historic District," December 1974, for additional information.

NORTH OF MARKET PLANNING COALITION

295 Eddy Street, San Francisco, CA 94102

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December 6, 1994

Ms. Christal Waters,
Office of Project Development and Management
400 R Street, Suite 5100
Sacramento, CA 95814

Dear Ms. Waters:

On behalf of the Board of Directors of North of Market Planning Coalition, I am writing to express our opposition to the State of California's current recommendation to build the proposed New State Office Building (four elements ranging from 16 stories and tapering down to 11 stories) at the vacated California State Building (350 McAllister) and the existing Annex (455 Golden Gate).

Q-1

Instead, we urge you to recommend approval of Alternative 2 which would include renovation of the California State Building, renovation of 525 Golden Gate Avenue, and a smaller New State Office Building at the Annex site. It is our belief that the current proposed project neither serves the best interests of San Francisco Civic Center or of the Tenderloin neighborhood.

As we related to the Design Team in several earlier meetings in the process, the proposed building promotes a bulky mass that is neither aesthetically pleasing or in keeping with the ambiance of the Civic Center. The 209 foot height level is inconsistent with City Planning Code Height and Bulk limits. On the Golden Gate side, we believe the sheer wall design of the building will essentially produce an isolating effect on Golden Gate (i.e., the Federal Building is not the building to follow). We are concerned with both the winds and the shadow effect the building will throw on the neighborhood. For those of us who work and live in the Tenderloin, there is no question that the winds and the shadows will negatively impact the neighborhood.

Q-2

We are hopeful the State of California will revise the project plan and bring back a project that fits San Francisco.

Sincerely,

Alice Wadlington,
President

Letter Q - Alice Wadlington, President, North of Market Planning Coalition, December 6, 1994

- Q-1) Comment noted. The commenter expresses support for Alternative 2, and does not address the adequacy of the Draft EIR. For information, it should be noted that the proposed project would include renovation and reuse of the California State Building, as well as construction of the proposed New State Office Building, as described in the project description, Draft EIR pp. 1-28. Regarding the feasibility of reusing 525 Golden Gate Avenue, please see the Supplemental Analysis of Alternative 2, p. 5 of this document.
- Q-2) The response to Comment C-1 discusses the project's effects on the Civic Center historic districts (see p. 48 of this document), the project's visual effects (see p. 52), and the project's relationship to the City Planning Code (see p. 54). As noted in that response, the Draft EIR concludes that project effects on architectural resources and visual quality and urban design would not be significant. As further noted in that response, the Draft EIR states on p. 43 that the proposed New State Office Building would exceed the height limit for the site in the San Francisco City Planning Code, and that this exceedence in itself would not be a physical, environmental impact and would not be a significant effect. For a discussion of the Golden Gate Avenue facade and its potential to have an "isolating effect," please see the response to Comment F-2, beginning on p. 72 of this document. The Draft EIR discusses shadow on pp. 61-70, including Figures 27-29, pp. 63-65, which illustrate shadow effects at 10:00 a.m., 12 noon and 3:00 p.m. on the winter and summer solstices and on the spring and fall equinoxes. As stated on p. 62 of the Draft EIR, the project would create new shadow on streets and sidewalks and on the plaza at the Philip Burton Federal Building. The project would not add shadow to Civic Center Plaza or any other public open space under the jurisdiction of the San Francisco Recreation and Park Commission. As stated on p. 67 of the Draft EIR, shadow effects of the proposed project would not be significant because the Federal Building plaza would be expected to have limited use. The Draft EIR discusses wind on pp. 71-79. As stated on p. 74, with the project, and with the project plus potential development, the wind environment would be about the same, or improved overall, compared to existing conditions. Of the points tested, winds would decrease at most locations while increasing at some locations. Of six locations tested that currently exceed the hazard criterion, winds at three locations would drop below the hazard criterion. There would be no new exceedences of the hazard criterion, and wind effects would not be significant.

IV. PUBLIC HEARING COMMENTS AND RESPONSES

The comments in this section are presented in the form of the complete transcript of each commenter's remarks at the December 6, 1994, public hearing on the Draft EIR, with each speaker's comments presented separately, as if it they were contained in a comment letter. Following each speaker's comments are the responses to those comments. As is the case with the written comments, the public hearing comments and responses are alphanumerically labeled, beginning with comment AA-1.

MR. RICH: I am Rob Rich. I am a member of the North of Market Planning Coalition Zoning Committee. I am a graduate of Hastings. I don't live in this area, but I do frequent it for filings and to do research. I bank down here, et cetera.

I have a couple of issues that I would like to bring up regarding adequacy. No. 1 is the parking or lack of it that is addressed in this plan. It seems that the EIR states that there are going to be approximately 5,360 new person trips per day and there would be a total of 2,500 workers at the project. However, only 75 parking spaces are being provided. That includes, as far as I can tell, ten bicycle spots and five motorcycle spots as parking spots.

This total seems low, especially in comparison to the City Planning Code requirements, which I understand doesn't apply here. But that would require on a project such as this over 1400 spaces. 58 of those would be handicapped. 73 would be bicycles. I don't see any provision for handicapped spots, and the bicycles spots seem quite low.

AA-1

The EIR itself estimates this project will create a demand for 615 spots. The assumption is that the existing facilities in the area are going to handle this increased parking demand.

When analyzing the numbers in the EIR, I have a question about what the off-street parking capacity is presently. On Page 126, it states that the off-street parking capacity is presently being used at 80 percent capacity. In the summary on Page 9, it states that off-street capacity is 66 percent. Perhaps I don't understand these figures properly, but it doesn't make sense to me that discrepancy, and it's really significant when we look at the difference there. If there is a total of 2920 spaces, the difference between 80 percent and 66 percent is the difference between 950 spaces and 584. So, I am concerned about that.

AA-2

It seems that a parking shortage has the obvious problem of hurting businesses which depends on customers to come in and use available parking spaces. It also increases the danger of accidents in the area. I think that is particularly relevant in the Tenderloin neighborhood, with over 4,000 children who live in the neighborhood.

AA-3

I propose that there is an increase in parking in the proposal here for the State Office Building, particularly for workers who would be carpooling. There could be an element for that.

AA-4

I would like to encourage bicycle and motorcycle use. I would like to encourage handicapped parking, which I don't understand the lack of, provision there. And it would be nice to provide some short-term parking for visitors on site.

AA-4
cont'd.

My second concern is, I would like to urge the adoption of what is considered as Alternative 2, which is the incorporation of 525 Golden Gate. The effect of utilizing that building in the site would be to drop, I believe, three stories off the total of this project. The effect on wind speeds on that would be that whereas 16 of the 38 wind test locations would -- with dropping the height -- would meet the 11 mile per hour pedestrian comfort criteria, under the present project, only 12 sites will do that. That is an increase in 33 percent of the sites meeting that criteria.

AA-5

Specifically under Alternative 2, the sites in front of City Hall, the two sites that are measured, the wind speeds will drop. Four of the five spots where measurements were taken along McAllister Street in front of entrance to the old State Building, the wind spread will drop. Of the two sites measured in Civic Center Plaza, one will drop, and six of the seven sites along Polk Street will experience a drop in winds.

Finally, my understanding on why Alternative 2 is not being considered is because it's more expensive. According to the EIR, construction cost is one million dollars. The current project costs \$200 million to build. Alternative 2 is \$201 million. That is a half percent difference.

When analyzed over the 25-year period, there seems to be an increase in the principal, the interest, and O&M, which I take to be overhead and maintenance, costs of \$22 million, which represents \$880,000 a year.

What I didn't see addressed in the EIR are what the current O&M costs are for 525 Golden Gate. It seems faulty analysis to compare the cost of the project, of the new building, ignoring the cost that it currently costs to maintain that building. It would be nice to see that to accurately compare these figures.

The advantages of 525. Use a largely vacant building. It's a bad thing in a neighborhood to have a vacant building. That building is currently boarded up in the front. I understand that CalNet is using the basement and that is why it can't be demolished. If CalNet is an important use of the building and we can't demolish it, it seems that that use should be placed in a seismically safe building.

AA-6

What Alternative 2 allows is for a one million dollar construction cost to make sure that that valuable use is in a seismically safe building.

I also understand that the building contains asbestos which needs to be abated. That makes it something of a -- difficult to dispose of that building, with the asbestos. For a one million dollar construction cost, we make it seismically safe, use the building, we deal with asbestos, lower the winds. And there is also the possibility for staging the use of the occupancy. Because it's a different site, there is the possibility that construction could start early or finish earlier there and possibly save rental cost throughout the city for the uses.

Commenter AA - Rob Rich, North of Market Planning Coalition

AA-1) While the project, as a State building, is not subject to local zoning controls, information on the City Planning Code parking requirements is provided for information, on p. 134 of the Draft EIR. As stated in Endnote 13, p. 151, the Code requirement described is that for a project outside the C-3 (Downtown) and South of Market Zoning Districts, as the P (Public) Use district has no specified parking requirement. (The project is within a P Use District, where it is a permitted use.) This hypothetical calculation of required parking was made for informational purposes, and is conservative; the hypothetical City Planning Code parking requirement could have been discussed in the context of the C-3 Districts, where no off-street parking is required because of "the compact and congested nature of the downtown area . . . , the accessibility of this area by public transit, and programs for provision of public parking facilities on an organized basis at specific locations" (City Planning Code Sec. 161(c)). As stated on p. 124 of the Draft EIR, the project area is well served by MUNI and other transit operators. Public parking in the project area, including the Civic Center Garage across McAllister Street from the project site, is described on p. 126.

With regard to parking, project parking demand would be 615 spaces, as stated on p. 133 of the Draft EIR. Page 133 also states that when added to existing parking demand in the study area, the resulting overall (on-street and off-street) occupancy rate would increase from about 72 percent to about 86 percent. In other words, project parking demand would be accommodated by existing supply. As stated on p. 134, cumulative parking demand would result in a parking shortfall of about 60 spaces (assuming no on-site parking would be provided with forecast cumulative development projects), and about 730 spaces on certain weekdays when special events in the Civic Center create peak demand. A parking shortfall would result in people parking farther from their destinations, or shifting to other modes of transportation. Therefore, the Draft EIR concluded that parking impacts would not be significant.

AA-2) As stated on p. 133 of the Draft EIR, the total existing off-street parking supply in the study area is 2,920 spaces, and existing off-street demand is about 1,930 spaces, yielding an occupancy rate of about 66 percent. Page S-9 is correct; please see Chapter II, Revisions to the Draft EIR, for a revision to p. 126.

AA-3) As stated in the response to Comment AA-1, above, unmet parking demand generated by the project would increase parking occupancy (on- and off-street) in the project area from about 72 percent to about 86 percent. Increased traffic circulation is therefore is not expected to occur, and there is no expectation that accidents would increase noticeably. Similarly, with regard to effects on business, at 86 percent occupancy, adequate parking would be available.

Also as noted in the response to Comment AA-1, cumulative parking demand would result in a parking shortfall, particularly on peak special-event weekdays, assuming no on-site parking would be provided with forecast cumulative development projects. This shortfall would result in people parking farther from their destinations, or shifting to other modes of transportation.

AA-4 Comment noted. The comment addresses the project design, and not the adequacy of the Draft EIR. For information, motorcycle parking, parking for disabled drivers and bicycle parking would be included in the project, as stated on Draft EIR p. 134 and in response to Comment O-6, p. 136 of this document. Please see also p. 148 of the Draft EIR and the response to Comment F-4, p. 77 of this document, for information on the state's Transportation Demand Management program, designed to reduce vehicle trips and, thereby, parking demand.

AA-5) The comment expresses a preference for Alternative 2, and no response is required. For information, the commenter correctly notes that wind speeds at many locations would be diminished with Alternative 2, compared to the project. Compared to the Existing-plus-Project condition, winds in the Existing-plus-Alternative 2 condition would be greater at four locations (by 1 or 2 mph), be less strong at 15 locations (generally, by 1 or 2 mph, and by 3 mph at one location), and be the same at 19 locations. For Alternative 2 plus Potential Development, compared to the Project plus Potential Development, winds would be greater at six locations (by 1 mph), less strong at 10 locations (generally, by 1 or 2 mph, and by 3 mph at one location), and the same at 22 locations. Changes of 1 or 2 mph would be difficult to distinguish. As stated on p. 224 of the Draft EIR, wind effects of Alternative 2 would be similar or improved, compared to those of the proposed project. Neither the proposed project nor Alternative 2 would result in significant wind impacts.

AA-6) Regarding the use of 525 Golden Gate Avenue and the existing condition of that building, including financial issues and a discussion of the Calnet telephone switch, please see the Supplemental Analysis of Alternative 2, p. 5 of this document.

MR. MICHAEL: My name is Ed Michael. I speak only for myself. But by way of background, I retired from the Department of City Planning in San Francisco. I worked in the Civic Center area for 30 years. I was also secretary to the Landmarks Board for about eight years.

I am very delighted that Mr. Casper mentioned the dome of City Hall, because in here they speak of that dome as being the primary visual feature.

I want to point out that every major building in the Civic Center, save one, has repeated that dome in some form or another, either in windows or doorways -- every building, including the Department of Public Health.

I wonder whether this addition wants to be a part of the Civic Center or not. I don't advocate a dome for it. I would also say, I don't advocate -- anything I say is not to be taken as saying I am looking forward to seeing it, I want that change. I just want a re-look at the design.

The only building that doesn't repeat the dome in the Civic Center is the new main library. I keep hoping that maybe we will be surprised that there will be an arch in there when they uncrate the building.

But what I would like to point out is that the new facade that you see there is going to be 340 feet closer than the facade you see now of the Federal Building. That is over a full city block. City blocks are 275 feet. So, you are going to see that building with much more detail and much more clarity than you see the Federal Building.

BB-1

The only reference I can find to making that building compatible with the thrust of the Civic Center, the Beaux Art influence, is the use of the materials. Now, we know Skidmore's have a compass in their office because they have given us Davies and Pat Brown building. And it sort of appears a curve here, but you are not quite sure of it. But the curves also work on vertical surfaces. If you go downtown and look at those old Beaux Art buildings, look up at the tops, over and over and over again, to end that building, buildings much shorter than this and much higher, arched windows. They might not work here. It would probably take a total redesign. But it could soften it.

But what is happening also is, for 412 and a half feet, you're seeing a straight line end at the top of a building again. The same thing, it reinforces that straight line, the harshness of the Federal Building behind it. Two of them are much stronger than one.

What I am really saying is, I think there should be another look taken at this building to say, do we want it to be a part of the Civic Center, and, if so, what can we do about it? Again, no specifics. I am sorry, but I don't see it relating. It might be anyplace else.

Also, shades -- the depth of the facade. That is my criticism of the new library. It doesn't have the depth from the surface of the building back to the windows, which is a characteristic of the Beaux Art, which gives its strength, its rhythms, and all that. Again, look at the new library about 2:30 in the afternoon compared with the old one. Go downtown, look -- you can do it today and have a contemporary building. Look at 720 Market Street. Small building, about ten stories high. But see how they have used materials with deep seated windows that fits beautifully with those older buildings on Market Street. You almost don't see it, it fits in so well. But you look at it and you realize how well they have handled it.

BB-1
cont'd.

So, I think the report is inadequate with reference to visual design. I have more specifics that I won't go into. I will submit them for corrections in the text.

But one thing I would like to say also. The only place I have ever seen this statement is in other EIRs, and that is on Page 84, that Bernard Cahill's design was chosen for the Civic Center. Bernard Cahill's design, the only one I've ever seen, came out in 1899 and bears absolutely no resemblance to the Civic Center of today. I was told that he had a later one. If there is a later one that bears a resemblance, I wish they would give the citation so we can make a comparison to see whether that statement is accurate or not.

BB-2

With that, I will close.

Commenter BB - Ed Michael

BB-1) The EIR adequately assesses effects related to Visual and Design Factors in Section III.B, pp. 45-60. Please see the response to Comment P-5, p. 142 of this document.

BB-2) Please see the response to Comment P-7, p. 143 of this document.

MR. PHILLIPS: My name is Marvis Phillips. I am a member of the North of Market Planning Coalition. I am also a block captain in the Tenderloin. I live half a block from Hilton Hotel loading dock.

The loading dock on Page 14 shows a small truck and a semi truck sitting at the loading dock. Loading docks at the Hilton Hotel take four lanes of traffic. It's three lanes on Ellis Street, a parking lane, and the sidewalk to get into a loading dock similarly designed.

If you take a sidewalk, you are going to have to move a parked car to get to that sidewalk. The loading dock is not correctly done. I have had the same loading dock design on the McDonalds Building. They had to alter that for a reason. The building is too sharply angled. You have a straight angle. If you have a truck sitting in that loading dock, because you have a limited space, you are going to block traffic on Larkin Street for probably about a good ten minutes getting that truck positioned to get into that loading dock, which means you will have traffic backed up to Mission Street. I don't think that is exactly legal.

CC-1

Second of all, in your EIR, it talks about number of persons. You talk about adding 1,530 persons in a peak period. If everybody drives a car, whether it comes out of Civic Center garage or your garage, look at the traffic you're adding to that area.

CC-2

My other thing is, you talk about MUNI. Take a good look at MUNI. MUNI has 12 handicapped lines in the Civic Center area, including Metro, but only one handicapped electric line. That is the No. 31. The No. 5 is not wheelchair accessible. That stops right at your front door. I think you need to look at trying to get wheelchair accessibility to No. 5 line the same time as trying to get service to your building.

CC-3

As for the building design in itself, I have nothing against it. However, I think you could take this style here, incorporate it here, because it would make this whole piece look a lot more enhanced than just here. Thank you.

CC-4

Commenter CC - Marvis Phillips, North of Market Planning Coalition

CC-1 It is anticipated that deliveries by semi-trailer trucks to the project site would be infrequent, such that only temporary disruptions to traffic flow would occur, during non-peak periods, on Larkin Street, and those disruptions would not be significant. (Although final project layout is not complete, the state recognizes that installation of a driveway on Larkin Street could eliminate up to two additional on-street parking spaces adjacent to the existing Annex driveway.) As described on p. 138 of the Draft EIR, the projected level of loading activity is lower than what would be expected to be generated by the same total floor area of general office space at the project site because of the different characteristics of government office and courts uses (i.e., efficiency of coordinated purchasing among the various State agencies) versus commercial offices (with each tenant receiving deliveries independent of other tenants). Therefore, project loading activities would not be expected to result in any protracted blockage of circulation on Larkin Street and, as noted in the Draft EIR, the impact would not be significant.

CC-2) As described in the project description (and other places in the EIR), the project would result in an increase of about 1,575 new employees at the project site. As described on pp. 127 to 129 of the Draft EIR, the project site would generate a total of about 1,430 person trip-ends (pte) during the p.m. peak hour (not 1,530 persons, as stated in the comment), of which about 900 pte would be net new (i.e., above existing trips generated by activities currently at the site). Person trip-ends includes all travel to and from the project site in automobiles, on public transit and other modes (i.e., walking, bicycles, taxis, etc.).

As stated on p. 128 of the Draft EIR, the project would generate about 340 net new p.m. peak-hour vehicle trip-ends (vte); these vte would be a combination of drive-alone trips and rideshare trips. The effect of the new traffic on project area intersections is discussed on Draft EIR p. 130, and was concluded to be non-significant.

CC-3) MUNI is implementing an ongoing program for converting bus lines to be wheelchair accessible. All new buses (diesel and electric) purchased by MUNI are wheelchair accessible. An additional 30 articulated electric trolley will be purchased by 1996, with full replacement of older non-wheelchair-accessible buses scheduled by 1999. The

5-Fulton line is among the bus lines that will be considered for conversion in 1996, about two years before project occupancy; MUNI staff will judge relative ridership needs for the various electric trolley bus lines in the City when allocating the new buses.

CC-4) The comment addresses the project design, and not the adequacy of the EIR. No response is required.

MR. JONES: Yes. I bought a building right across the street from this building just recently in August, at 324 Larkin.

You can see the back of my building on Page 58 and 59. According to the shadow study here, I guess my building won't be that be much affected. But the new shadow that this will cast is going to cast a shadow all down Golden Gate Avenue and all the streets around it. So, the streets and the sidewalks will be dark, and there's a lot of people who live around there.

DD-1

Also, it just occurred to me, I appreciated some of the speakers. When you go to Paris and you look at the Arc de Triomphe and Eiffel Tower, if you can imagine high-rise building around those, it really loses a lot of its beauty. I think that is what is going to happen here if we allow this huge building to come in so close to Civic Center. I love the design. I think it's a very nice design. I wish it were somewhere else. Thanks.

DD-2

Commenter DD - Bill Jones

- DD-1) Comment noted. Shadow impacts are described in Section III.C, pp. 61-70. Figures 27-29, pp. 63-65, illustrate shadow effects at 10:00 a.m., 12 noon and 3:00 p.m. on the winter and summer solstices. As shown in those figures, the project would not add new shadow to 324 Larkin Street (on the east side of Larkin between McAllister and Golden Gate) at the times indicated. Shadow from the New State Office Building would reach 324 Larkin Street in the late afternoon in spring and summer (see Figure 30, p. 69 of the Draft EIR), although the building is partially shaded by the existing California State Building and/or the existing Annex during those hours (see Figure 28, p. 64). Figures 27-29 also indicate that the project would add shadow to Golden Gate Avenue in varying amounts throughout the year.
- DD-2) The comment addresses the project design, and not the adequacy of the EIR, and no response is required. For information, please see the response to Comment C-1, p. 50 of this document, regarding the project effects on the historic districts.

MS. WADLINGTON: I am Alice Wadlington. I live at 324 Larkin, which is directly across the street from the present Larkin Street entrance to the State Building. I am also president of North of Market Planning Coalition.

I am concerned about the traffic. I realize that you have made plans to mitigate it to an extent, but even at present it is impossible for residents of 324 Larkin to draw into the [curb], to be discharged from a car, to be picked up, to take groceries in, or cleaning, and you have double parking all the time because of lack of access. What is going to happen to that situation when you increase the traffic so much?

EE-1

Also, there is the matter of safety. Even now, with the Federal Building retrofitting going on, and it's been going on for a few years, when you have the blocks up cutting off one lane of Larkin, you have tremendous traffic jams. Sometimes it's impossible for people to cross the street safely.

EE-2

We in 324 have several older people, and there just is increased danger for them. They do come out. I realize it's unusual to have the residents in primarily office area. But we are there and we are human, breathing people, and we do need the consideration of increased traffic.

In the traffic regulations also I notice that one way you mitigate is to have deliveries before 6:00 in the morning and I think it's 9:30 to 5:30 or 6:00, during the day, and after 6:00 at night. That is fine, theoretically, for the traffic. But those of us who live right across the street have had from the Federal Building, if I can judge construction, trucks arriving at 2:00 or 3:00 o'clock in the morning, parking across the street and unloading various materials. So, it's not very conducive to our rest times to have those deliveries at those hours, although I realize it mitigates traffic.

EE-3

Then in the health and welfare of the people, I am very pleased that you have made the studies you have made, and I hope they will be closely monitored for the harm that could come from asbestos, lead paint, and the underground waters. Because we certainly would be affected by that.

EE-4

Also, I may not have read your plans, but what about the demolition? What effect is that going to have on us? In September, I served a month on a jury over at City Hall. And the courtroom shook violently several times, as if we were about to have an earthquake. The judge stopped and explained, this was the result of the demolition across McAllister for the new court building. Now, those buildings were fairly low buildings, yet we felt this shaking, and we were probably three times the distance from the demolition as Larkin, 324 Larkin is. Larkin is right across the street. Are we going to have that effect on our buildings? And if we are, how can we mitigate it?

EE-5

Thank you very much.

Commenter EE - Alice Wadlington, President, North of Market Planning Coalition

- EE-1) The east side of Larkin Street between McAllister Street and Golden Gate Avenue, including the 324 Larkin Street frontage, currently has metered on-street parking spaces. The project would not change that condition, and therefore, the project would not affect the ability of residents at 324 Larkin Street to use the curb for pick-up or drop-off.
- EE-2) As stated in Mitigation Measure F.6, on p. 149 of the Draft EIR, the project would adhere to the recommended actions and practices established by the Civic Center Coordinating Committee, as part of the *Construction Staging Areas, Street and Sidewalk Use Plan* currently in preparation. Also stated on p. 149 is a slightly modified version of a standard San Francisco mitigation measure, which would also be adopted by the state, and which states in part, "[t]he project sponsors and construction contractor(s) would meet with representatives of the City of San Francisco Department of Parking and Traffic (Traffic Engineering Division), Fire Department, MUNI and the Transportation Section of the Department of City Planning, as applicable to determine feasible traffic mitigation measures to reduce traffic congestion and pedestrian circulation impacts during construction of this project . . . "
- EE-3) Mitigation Measure G.1.b, Draft EIR, p. 160, as modified in Chapter II of this Final EIR Addendum, Revisions to the Draft EIR, would prohibit nighttime construction activity (between 8:00 p.m. and 7:00 a.m.) that would generate noise in excess of 5 dBA above ambient noise levels (as opposed to all nighttime construction activity), which is consistent with the San Francisco Noise Ordinance and with the significance criteria on p. 154 of the Draft EIR. Truck pass-bys would not be expected to create noise in excess of 5 dBA above ambient levels, because ambient noise is measured over a 15-minute average. (Please see Chapter II, Revisions to the Draft EIR, for a footnote added to p. 154 to clarify that the San Francisco Noise Ordinance, on which mitigation in the Draft EIR is based, defines ambient noise as the 15-minute average.) It should be noted that Mitigation Measure G.1.a on p. 160 of the Draft EIR would require that truck noise not exceed 80 dBA at 100 feet, which would reduce operational noise of construction trucks. Noise from truck pass-bys would be comparable to that from the existing 19-Polk MUNI bus. Together, Mitigation Measures G.1.a and G.1.b would prohibit excessive nighttime noise and would reduce potential effects of construction noise at night to a less-than-significant level. Further, Mitigation Measure H.2, in the Air

Quality section on p. 170 of the Draft EIR, would prohibit trucks and other construction equipment from being left to idle for more than 10 minutes, which would reduce waiting noise, as well as emissions, of construction trucks. Finally, as noted on pp. 154-158 of the Draft EIR, construction noise effects would be temporary.

Regarding loading activities once the project were operational, the existing Annex is open for deliveries between 6:00 a.m. and 5:00 p.m. The project would not be expected to receive deliveries outside these hours, unless mandated to do so by direction outside the control of the Department of General Services, such as for congestion management or compliance with air quality regulations at some time in the future. Depending on availability of staff, the Office of Building and Grounds might restrict deliveries to the normal working hours of 8:00 a.m. to 5:00 p.m. (Trash and recyclable material pickup could occur outside these hours.) As noted in the response to Comment G-12, p. 87 of this document, the Department of General Services has indicated that the project would comply with the San Francisco Noise Ordinance.

- EE-4) As noted by the commenter, the Draft EIR describes potential effects from hazardous building materials, such as asbestos, lead-based paint, and PCB-containing equipment, in Impact J.1, p. 193, and potential effects from subsurface contamination of soil or groundwater in Impacts J.2 through J.4 and Impacts J.6 and J.7, pp. 194-198. Potential risks from underground storage tanks are described in Impact J.5, p. 196. The Draft EIR includes mitigation measures that would reduce all identified impacts to a less-than-significant level. As stated in response to Comment F-4, p. 77 of this document, a Mitigation Monitoring and Reporting Program (MMRP) will be prepared as part of the EIR process for this project. The MMRP will specify monitoring actions, implementation responsibility and mitigation monitoring schedule for each of the mitigation measures set forth in the EIR.
- EE-5) Vibration impacts are discussed in the Cultural Resources analysis in the Draft EIR, Impact E.5, p. 110, with respect to potential structural damage. The Draft EIR identifies mitigation measures (see p. 117) that address this issue. As stated in Mitigation Measure E.5.a, p. 117, instrumentation would be installed to monitor vibration at the Civic Center Powerhouse, which is adjacent to the commenter's residence at 324 Larkin Street. (The 324 Larkin Street building is the nearest residential structure to the project site.) This equipment would allow the demolition and/or construction contractor to monitor vibration at 324 Larkin Street in addition to the Powerhouse, thus avoiding

significant impact in the form of structural damage at 324 Larkin Street. In addition, Mitigation Measure I.2., Draft EIR p. 179, would require preparation of a final geotechnical report that could include recommendations for establishing survey points to monitor structures adjacent to the project site. The construction contractor would be required to follow the geotechnical engineer's recommendations. The design-build team would perform a pre-construction survey of buildings within about one-half block of the project site, including 324 Larkin Street, to determine the pre-construction building condition. This would allow for monitoring of any superficial damage that might occur. It should be noted, as stated in the Draft EIR on p. 155, that foundation pile driving would not be included in the project.

Vibration from demolition activities could also have annoyance effects, given the proximity of the site to the residents at 324 Larkin Street, for residents who were at home during daytime demolition and/or construction hours. This impact would occur on occasion within the approximately four-week demolition period. (As stated on p. 155 of the Draft EIR, no pile driving would be required during project construction.) The Draft EIR does not include any mitigation measures specifically designed to address potential annoyance impacts of vibration for the nearest residents; however, the noise mitigation measure that would limit construction activities during certain hours of the day (Mitigation Measure G.1.b, p. 160) would also limit vibration impacts from demolition to the least noise-sensitive hours of the day. In addition, the design-build team would designate a neighborhood liaison to receive inquiries and complaints (including those related to demolition-induced vibration) from area residents and employees in the Civic Center area, and would supply public information regarding the construction schedule and construction activities, in particular to residents of adjacent properties. With the above-noted mitigation measures, and with the relatively short duration of the impact (off and on for approximately four weeks), annoyance impacts due to vibration from demolition would be considered less-than-significant.

MS. HOGAN: Good afternoon. I am Terry Hogan. I am also with North of Market Planning Coalition on the Zoning Committee and a board member.

I live in the Tenderloin, as does Alice, not anywhere near as ground zero as she is, but I do live on Eddy Street. This does affect my neighborhood life. Therefore, I am here.

I have quite a few arguments with this building. I am not quite as pleased, I am afraid, with the architecture as some of the former speakers. Now, from the Civic Center site, it ain't too bad. It's not. You could live with it. But, gee, from the Golden Gate side, it's a great big block. That is all you can say for it. It's a great big block. I am glad they got the rectangular thing and the thing that goes out over this street, but that doesn't keep it from being a great big block.

FF-1

It's come to me as we've gone through this month in and month out that all this lovely indoor atrium space I think would be better used by making something on the outside of the building to keep it from being a great big block. We've already got one of those. We call it the Federal Building. We need to do something to get the blockiness out of this.

Also, the sidewalk there is extraordinary narrow, and they haven't done a damn thing to make it any wider. Somehow or another all this interior free space, which is lovely if you're working there, I think, would be better used for all of San Francisco if it was kind of slipped on the outside a bit.

FF-2

Okay. Then as to -- what is that called? Alternative 2, something like that. That is my hope and dream. We are going to have a State Building, and that is okay. I am a Californian. I am a San Franciscan first, but, after all, that does mean I am a Californian.

Now, at 525 Golden Gate, we've got this building that, I don't know. One time I hear it needs seismic upgrading. Next time I hear it doesn't need any at all. And you want to sell it. Well, no, you really don't want to sell it. Meanwhile you've got all this spaghetti in the basement called the Bay Area, the Greater Bay Area California -- communication system of some type or other, and you can't exactly throw that away, from what I've heard. And it would cost quite a big bunch to put it somewhere else. You're not planning to put it in this building. So, for God's sake, why doesn't the State of California, instead of doing a government thing, which is solve one problem at a time and then you got a whole mess of problems to solve after that because you didn't solve the next problem down the road, why don't you just try to solve two problems all at once. Put part of that building at 525 Golden Gate -- there's a lot of things to be said for this. I just found out today you get rid of -- not asphalt. What is that stuff called? Asbestos. I didn't even know about that or I'd already be yelling about it months ago. Get rid of your asbestos, you get a nice new shiny building, which I will probably be back here bitching about because I don't like that architecture either. But that is in the future. You get a permanent -- well, as permanent as things are in man's years -- new home for our communications system. And it might cost a million more or a million five more now. But I am wondering what it's going to save down the road. Because the problem at 525 McAllister is not going to disappear into a puff of smoke because you didn't take care of it now. It will still be there, leaking asbestos, apparently. I don't think it is all that seismic safe, from what I have heard at various times. I am not sure on that. But if it's so seismically safe, why did California close it right after the earthquake?

FF-3

I don't see why it's so hard to imagine two buildings -- I know, there are city employees who would actually have to walk across the street. And I feel for them on a rainy day. But fortunately in California we don't have that many. And I don't know, maybe you could do an underground tunnel from one building to another. I don't know why you couldn't. They do it at other places.

FF-3
cont'd.

Thank you. Other than that, I am tickled to death.

Commenter FF - Terry Hogan, North of Market Planning Coalition

- FF-1) The comment addresses the project design, and not the adequacy of the EIR. No response is required. For information, the design-build team has indicated that additional refinements could be made to the design of the Golden Gate Avenue facade. Please see the response to Comment F-2, p. 5 of this document.
- FF-2) The effective width of the sidewalk on Golden Gate Avenue on the project block is nine feet. (The effective width is the narrowest portion of the sidewalk and is calculated by subtracting the space taken by poles, planter boxes, etc., from the total width.) A nine-foot effective width is not considered narrow. As described on p. 135 of the Draft EIR, pedestrian flow rates, or the number of pedestrians passing a point per minute, serve as the basis for determining the quality of pedestrian flow (also see Table C-3, Appendix C, p. A-51, of the Draft EIR). The same methodology used for crosswalk analysis in the EIR applies to sidewalk analysis. Unimpeded flow, characterized by minor conflicts among pedestrians, occurs with up to about 275 people per 15-minute period passing a point on a nine-foot-wide sidewalk. Still acceptable, though not preferable, impeded flow occurs with up to about 815 people per 15-minute period passing a point on a nine-foot-wide sidewalk. Based on the projected increase in pedestrian trips (about 360 midday peak trips and about 250 p.m. peak trips) described on p. 135 of the Draft EIR, it is anticipated that sidewalk conditions on Golden Gate Avenue between Polk and Larkin Streets would operate at impeded flow during both the midday and p.m. 15-minute peaks, which would be acceptable and would be a less-than-significant impact.
- FF-3) The 525 Golden Gate Avenue building is neither "leaking" asbestos nor in imminent danger of collapse. Please see the Supplemental Analysis of Alternative 2, p. 5 of this document, regarding the use of 525 Golden Gate Avenue and the existing condition of that building.

MS. MILLER: My name is Mary Anne Miller. I am a member of the board of San Francisco Tomorrow. San Francisco Tomorrow is, we like to say, the premier urban environmental organization in San Francisco.

We have a large board, and from that board we have several committees. We have an Urban Design Committee for the Civic Center, and we have been actively looking at the city courts building, of course the main library, and now this state building.

We are concerned with the visual issues, I think, more than anything, and the fact that this Civic Center has an enormous integrity and enormous prestige worldwide. It's not just a place for San Francisco. This is really recognized as one of the most beautiful civic centers.

And if you know anything about classical architecture, and I know that the esteemed architects do, but they have a program here that is much too big for this site. So, I think that SFT, San Francisco Tomorrow, would really like to see that preferred alternative shown in some drawings that we can evaluate. We are just evaluating the drawings in the EIR that refer to that model. But we need some drawings in the EIR with the alternatives. But we will go on record as supporting Alternative 2, with some major massing changes.

GG-1

What you know from this EIR about the Beaux Art style is that it's very solid and that it usually limits itself. Because it's solid masonry or masonry appearing buildings, it cannot go very high. You know, the classical style was limited in height because of the construction type. So, as soon as you start to break things up and make vertical sorts of buildings -- and I am talking particularly about Polk and Larkin, where, if I can show you on the model, you have what are, in effect, three or perhaps four tall thin vertical strips, and those are supposed to link in with this solid masonry building here, the front on this whole glorious Civic Center.

GG-2

The net effect of this light shaft here, purportedly bringing light into an atrium -- an atrium is shown in here, and you get light in above. Instead, we are getting light from the sides.

The net effect is to put a glass office building, looks like the discredited curtain wall buildings of the Fifties and Sixties that we now abhor, looks like the Federal Building. But it separates the two attempts at making some massiveness here, so you effectively have one, two, three, and perhaps four tall vertical shafts.

We were thinking that if there is a certain logic in wrapping this shape around and bringing it around here and reiterating some of the cornice elements -- we are looking for visual elements in this EIR. I know you're dealing more with the visual impact. We are looking for visual elements that will wrap around this. Plus the fact that I think your drawings need to be amplified even if you were just going with this current project as it's proposed.

GG-3

You need Figure 34 on Page 88, and it's A. It's the top drawing. That is the important drawing for the pedestrian in San Francisco and not for the flying sea gull. You know, the model does it for a bird or for a person in another tall building. But if you're a pedestrian, which is what we all are when we walk around and enjoy the Civic Center or enjoy our future Civic Center, because right now it's in a state of some disarray. But the point is, when you're a pedestrian, you're standing -- and if you're at Page 88, you can see that that just shows the existing buildings. It doesn't show how this proposed project would in fact put a very tall, as Mr. Michael said, you know, maybe the Federal Building is over here, but this is a hundred and "X" number of feet closer to you as you're looking at it, especially from these corners.

GG-3
cont'd.

So, I am looking for a pedestrian point of view, which is, we, the user, we, the citizens, are on the street most of the time, not up in an office. So, I think you need to amplify the kind of exhibit you have there on Figure 34 and show the proposed -- this is just my notes. I will get something to you a little more by December 21st. But I think you need to show that massing on Figure 34, where it would really count.

I can appreciate what the architects are doing, and it is to try the mask the ugliest building in town, the Federal Building, by putting something up there. But I think this has gotten too wide. It's come too close to that kind of precious scale, that 80-foot height, of the rest of the Civic Center.

GG-4

I just have one other comment about that strange canopy. Other people have talked about it. I know it's supposed to mitigate the wind. But can't it be designed in some attractive way?

GG-5

Furthermore, Mr. Michael tells me that scaled it off and it's actually over into the street right-of-way. It's much too wide. It doesn't shield anybody from rain. It isn't really accommodating.

The sidewalks, they're narrow. And while the plan would make you think there is an indentation there that people can come in to and seek shelter, that is true, that they could be sheltered, but they will still be in the wind and semi sheltered a little bit. So, I agree with all the speakers who said we need something more for the pedestrian on Golden Gate. We need pedestrian-eye view on all of the angles of it for the EIR.

GG-6

Thank you.

PRESIDENT MOY: Thank you, Mary Anne. Before we go to the next speaker, I would like to have a point of clarification by Ms. Waters.

MS. WATERS: There are visual simulations of the proposed new building, and they're on Pages 54 through 59 of the draft EIR. They don't show the same aspects that she mentioned, I believe, on --

PRESIDENT MOY: Ms. Miller, have you looked at those?

MS. MILLER: Those are elevations --

THE STENOGRAPHER: Please use the microphone.

MS. MILLER: I think that this one, Figure 22, is so far away that we can't appreciate it. I understand we are pedestrians there and at the crosswalk way over in front of 100 Larkin, but the -- of the library site. But the point is, it's too collapsed here, this perspective. It's impossible to see how you would feel about the height.

GG-7

I think when you see it -- I've got a scale here that is really a little skewed, but I can improve this by December 21st, which shows you what really would have or should have on Figure 34, I think, is having it more like that. That really shows the impact of it.

Commenter GG - Mary Ann Miller, San Francisco Tomorrow

- GG-1) Comment noted. The commenter expresses support for Alternative 2. Please see pp. 29-33 in Chapter II of this document for visual simulations of Alternative 2.
- GG-2) The comment addresses the project design, and not the adequacy of the EIR. No response is required. It should be noted that the commenter's description of four separate vertical elements is included in the Draft EIR Project Description, beginning at the bottom of p. 7, where the design is described as "intended to taper down the new building from near the 300-ft.-tall Federal Building north of Golden Gate Avenue, to the south at the 80-ft.-tall California State Building and other buildings of the Civic Center." As noted in the Draft EIR on p. S-3, the facades of the New State Office Building are "intended to be a contemporary design compatible with the California State Building," with similar granite cladding.
- GG-3) The visual simulations presented in the Draft EIR were selected to depict the proposed New State Office Building in appropriate context for the analysis of visual impacts. As stated in the response to Comment C-1, p. 52 of this document, the analysis of visual effects includes the project's effect on the entirety of the existing visual setting. In particular, Figure 22, p. 55 of the Draft EIR, presents the proposed project in the context of City Hall, the most important visual feature in the Civic Center. Figure 24, p. 57, illustrates the proposed project from Civic Center Plaza, the most important public viewpoint. Figure 26, p. 59, illustrates the four vertical elements of the proposed New State Office Building, described on Draft EIR p. 7, that are important to the building's visual function as a transitional element between the existing historic Civic Center buildings and the existing Philip Burton Federal Building, as stated on p. 51 of the Draft EIR. Visual effects of the proposed project are adequately addressed in the Draft EIR in Section III.B, pp. 51-60, including Figures 21 through 26. Additional visual simulations of the proposed project are not required to document the visual impacts. However, for information, two additional simulations of the proposed project are provided on pp. 27-28 of this document. Visual simulations of Alternative 2 from those new viewpoints are also provided.
- GG-4) Regarding the project's effects on the historic district, please see the response to Comment C-1, p. 50 of this document.

- GG-5) As noted in the response to Comment P-2, p. 142 of this document, the proposed canopy would overhang the curb lane of Golden Gate Avenue. Please see Chapter II, Revisions to the Draft EIR for additions to p. S-3 and p. 22 of the Draft EIR text to clarify the description of the proposed canopy, in response to Comment F-2. It would be expected that the proposed canopy would provide shelter from the rain in most instances.
- GG-6) Regarding sidewalks, please see the response to Comment FF-2, p. 165 of this document. Regarding the Golden Gate Avenue facade and the proposed arcade, please see the response to Comment F-2, p. 72 of this document. Please see also the response to Comment GG-3 regarding visual simulations.
- GG-7) Please see the response to Comment GG-3.

MR. PAUL: My name is Brad Paul. I would like to thank you for this opportunity to comment on the EIR. I am speaking today as a board member of the Bay Area Women's Resource Center.

We have a project that has been going on for some time now that you may have read about called the Tenderloin Grade School Campaign. Our interest in this -- and I will walk over here to the model -- is that the two sites that are being considered for the Tenderloin School -- and I should mention, a previous speaker said there were 4,000 children in the Tenderloin. There is not now and has never been an elementary school for those children. They're bused to 46 different schools in the city.

Starting three years ago, we started this campaign to get a school. It's been very successful. In the last June bond issue for the school district, there is \$11 million to build the school. So, the question now is which site.

The two sites are, on this model, next door. This is the McDonalds, about to be torn down and replaced by a larger building here. So, it's everything you see here, plus these two buildings, since the model has been built, have been demolished. So, it's everything on this half block except for this building and the Lyons restaurant.

The other site is the Hastings site right here, directly across the street from the new building. We have been actively involved in discussions with the developer of the McDonald project and Planning Department on that site and also with your staff and have sent communication to you because we don't know right now which site it's going to go on.

But the impacts we are concerned about are the obvious ones of sun, shadow, wind impacts if there are elementary school and kindergarten children in here as well as some of the urban design questions that have come up. But from the school's point of view, and also the neighborhood, I should add, there is also a question about, in terms of urban design, what happens when you have a very active use here, but really dead space on this site, if the school doesn't go here, and at 525, which has been vacant for sometime now. I will address that again in a minute in terms of suggestions to improve the EIR.

HH-1

HH-2

I want to spend most of my time just talking about the alternatives. Alternative 3, which you heard described by your staff, has the added benefit from the neighborhood's point of view, if the school doesn't go in the Hastings site, of doing something there so it's not just a parking lot, which is particularly troublesome at night, I think, for both your employees, for state employees, and neighborhood residents walking by there. It's very similar to this block over here on -- I guess this is Hyde Street coming down here, where you have two -- Hastings' two buildings -- but there's not a lot of street activity or light there, or the base of the building we are in right now in the back side of it, again, where there are no windows, no light, it's very dark and very dangerous at night for pedestrians.

HH-3

The problem with Alternative 3 is that the construction costs alone are \$14 million more and the combination of interest and operating and maintenance costs over the 25-year life of the project are almost a hundred million dollars more.

But with Alternative 2, you have some very interesting opportunities here, and I will just amplify on some things other people have spoken about and talked about, I think, changes you could make in the draft EIR to give you the opportunity to really decide which is the best alternative.

Alternative 2 solves one of the first problems, which is the attempt to put too much square footage on a small site. I think you have heard most of the speakers address that in one way or another. Instead of 845,000 square feet on the prime site, it's down to 695,000. It goes from 16 stories to 13, 209 feet to 180, a difference of about 30 feet. It accomplishes this by renovating the 525 building and doing something with that and getting I think it's 120,000 net new square feet out of that.

In terms of the deficiencies in the EIR, in analyzing this alternative, the two reasons for not choosing it, as I read it, are that it's more expensive -- and I will address that in a minute -- and you see more of the Federal Buildings from Civic Center. I don't think that is a big deal for most people. I really don't. If the problem is -- if you stand right here in the middle of Civic Center, instead of, as one of the drawings, I believe it's Figure 22, shows, you see one floor of the Federal Building versus a 30-foot lower building here seeing three or four floors -- I think most people would vote for seeing a few more floors to get the benefit of Alternative 2.

What I think is needed in the EIR, the final EIR, are some drawings and photomontages what give you a better sense of what 30 feet means. As I drew it on one of the diagrams, if you dropped this, start dropping these all down three stories, this comes down to about here, the first segment. The second segment comes down to about this size. What you are getting is a step here, here, and here, and suddenly all the verticality that was just spoken about by the last speaker isn't as big a deal from an urban design point of view. But from this point of view, for the Tenderloin Grade School, it really begins to impact shadow, wind, and sun issues and really opens up that Hastings site for the school kids that are going to be there if that site is chosen.

HH-4

I think that you can do a number of drawings that show that, both from this side, but particularly from this side, because the beginning of the Hastings site is right about here. When you start dropping the whole building 30 feet, you may not think of that as a lot looking at it from this angle, if you just take these three stories off here. But when you start to look at photomontages and drawings of the side view, it really has a dramatic impact. I think those are really needed in the final EIR so you can have that information, and the public can, in deciding whether the preferred project or Alternative 2 is really better.

Now, let me speak to the cost issue. It may be in fact that it's cheaper to do Alternative 2. I think there are some things you can do in the EIR, in the final EIR, so you can determine that.

First of all, the actual construction cost is only one million dollars more. It's a marginal amount of money. But let's look at the difference in the \$748 million for interest and operating and maintenance and the projected \$770 million that it says in the EIR Alternative 2 would cost. It's a difference of about \$22 million.

HH-5

IV. Public Hearing Comments and Responses

The EIR says most of that is for increased operating and maintenance of having two sites instead of one. What is interesting in that discussion, if you bring in what is happening right now at 525 Golden Gate, you've got a facility there, and I didn't understand this until very recently, that that is not just a Centrex phone system for the state buildings in the immediate area, but for most of Northern California. It is a big deal to move it sooner than the state wants to. I understand they don't want to move for at least five years.

HH-5
cont'd.

That explains why the number I've heard is about \$15 million to move that. Now, if the difference between project -- preferred project and Alternative 2 is \$22 million over 25 years, what you need in there is, what's the net present value of that? My calculation, it's about five or six million dollars today, in today's dollars. The cost to move that phone system in the basement in the next few years is going to be a lot more than that. As the previous speaker said, I think to be fair, if you're not going to close 525 right away, you should put in that calculation what's your operating and maintenance for keeping that building open just to have the phone system in the basement. There has to be some cost to that.

The other issue that comes up is what you might call the crime issue I have heard people in the neighborhood talk about, but the legal term for it is attractive nuisance. As long as this building sits vacant as a breeding ground for pigeons upstairs -- I've taken a tour of this -- it is going to be a problem. I think when the courts are finished, the judges as well as the neighborhood residents, city people, are going to say, what's the state doing with this building? And as Terry Hogan said, you may have an opportunity to really solve two problems at once and save money at the same time, something that's fairly unique in government work these days, to have that opportunity.

HH-6

So, I think you have to in the final EIR look at that issue and say, if we take into consideration all the economic factors involved, is Alternative 2 in fact cheaper than the preferred project?

HH-7

To again summarize, I think what you need in the final document are some better photos and renderings of what in fact this will look like, what Alternative 2 will look like so you can compare those to Alternative 1.

I have in my EIR -- I just drew on mine -- on Page 59, you can see in a heavy black outline what three stories at each of the major segments of the buildings looks like. It really is a significant difference. I think you can do a much better job in the final EIR so you can have that to compare.

HH-8

Also, on Page 57, there is a rendering of what it looks like looking back this way with the Federal Building behind it. I can see just what looks like the top floor of the Federal Building. I think we should see in a rendering similar to that what Alternative 2 would look like, really how much the Federal Building we'd just see, and there's a significant amount.

On the discussion of the cost, I have gone over those. There is another issue for us in the grade school, and that is the loading docks. Let me just briefly explain that and ask for some additional information.

HH-9

If the grade school goes on the Hastings site, we are restricted because there really isn't good access through the alley off McAllister, so we are probably going to have to have an entrance for at least the school and maybe for some associated housing on the site either on Golden Gate or Larkin.

If you have your loading docks on this side of the street, my experience is that MUNI is very reluctant to give up a lot of the street for loading docks and egress and access to the Hastings site. They have in their minds the possibility of blocking one lane on this side and one lane on this side.

HH-9
cont'd.

There is also, I believe, the [19] Polk Street bus runs up the street right here. So, if there is a way to mitigate the amount of use on this side, it will help us in terms of giving us flexibility on the Hastings site for our access and egress on that site, and we'd like to see that looked at. I don't know if it's possible to move the loading dock to the other side. I believe the parking garage is on that side. If you try to move your loading dock, you will have the same problems with MUNI on Polk Street that we may run into on Larkin, but that is an issue we would like to have addressed.

Also, in the preferred alternative, any ability, especially up toward the top, to create setbacks, will help in the crucial areas of shadow, sun and wind. I would ask you to look at, even with the preferred alternative, ways to do that.

HH-10

I think in Alternative 2, you have more flexibility. You don't have to give up these interior atrium areas to get those setbacks or give up other things because you have extra space on the 525 site. You may also be able to switch some of the loading over there or do something with the traffic on the two streets that would help us on the Hastings site.

HH-11

I will conclude there and just say that I think you have a very useful document here. I think it does provide a lot of information. With a few changes, you can have the information you need to make the final decision.

I will jump ahead to that and just say that I think that you are going to have an opportunity in a few months when that comes up by adopting Alternative 2 to take a good project and make it a great project.

Thank you.

Commenter HH - Brad Paul, Bay Area Women's Resource Center

HH-1) Comment noted. The Draft EIR analyzes shadow and wind impacts in the vicinity of the site in Sections III.C and III.D, respectively; neither was found to be significant. As shown in Figures 28 and 29, pp. 64 and 65 of the Draft EIR, the New State Office Building would cast additional shadow on the "Hastings site" in the afternoon from late winter through early fall. As shown in Figure 27, p. 63, in late fall through early winter, the existing Annex already shades much of the Hastings site. In late spring through early summer, new shadow would affect the Hastings site during the later afternoon hours. Regarding wind, at two points tested on the "Hastings site," wind speeds with the project and with the project plus potential development would be the same as or lower than, wind speeds under existing conditions. Regarding the proposed new elementary school, it should be noted that, since publication of the Draft EIR, the San Francisco Unified School District has selected the "Lyons site" - the half-block bounded by Turk, Polk and Elm Streets and Van Ness Avenue - as the proposed school site. This site is about one and one-half blocks northwest of the proposed New State Office Building. The school district is currently pursuing acquisition of that site, which would include frontage on all of the above-identified streets except Polk Street. The school would front on Turk Street, and the play yard would be on Elm Street, an alley between Van Ness Avenue and Polk Street. The existing Lyons Restaurant on Van Ness Avenue and an existing building on Polk Street would remain. The school could be open as early as 1997.¹

HH-2) As stated on p. 220 of the Draft EIR, the Department of General Services eventually proposes to dispose of 525 Golden Gate Avenue. As stated on p. 2 of the Draft EIR, no specific proposal for the 525 Golden Gate Avenue building has been developed, and the EIR does not evaluate the effects of any reuse or disposition of that existing building.

HH-3) Comment noted. The commenter expresses support for Alternative 3, and no response is required.

HH-4) Please see pp. 29-33 in Chapter II of this document for visual simulations of Alternative 2.

¹ Taboada, Arturo, Director of Facilities Management, San Francisco Unified School District, telephone conversation, April 4, 1995.

- HH-5) Regarding the use of 525 Golden Gate Avenue (Alternative 2) and the existing condition of that building, including financial issues, please see the Supplemental Analysis of Alternative 2, p. 5 of this document. As stated in that analysis, the present value cost of Alternative 2 would be approximately \$369 million, compared to approximately \$344 million for the proposed project, a difference of about \$25 million.
- HH-6) As stated on p. 220 of the Draft EIR, the Department of General Services eventually proposes to dispose of 525 Golden Gate Avenue. As stated on p. 2 of the Draft EIR, no specific proposal for the 525 Golden Gate Avenue building has been developed, and the EIR does not evaluate the effects of any reuse or disposition of that existing building, as reuse of 525 Golden Gate Avenue is not a project objective and is not included in the project.
- HH-7) Regarding the use of 525 Golden Gate Avenue (Alternative 2) and the existing condition of that building, including financial issues, please see the Supplemental Analysis of Alternative 2, p. 5 of this document.
- HH-8) Please see pp. 29-33 in Chapter II of this document for visual simulations of Alternative 2.
- HH-9) As stated in the response to Comment CC-1, p. 155 of this document, it is anticipated that, once in operation, deliveries by semi-trailer trucks to the project site would be infrequent, such that only temporary disruptions to traffic flow would occur, during non-peak periods, on Larkin Street, and those disruptions would not be significant. Use of Larkin Street, a one-way street, for loading would be expected to be less disruptive to traffic than would the use of Polk Street, a two-way street, as breaks in the traffic are more readily available on a one-way street. Regarding effects on MUNI service, the northbound 19-Polk line operates on the block of Larkin Street between the project site and the potential "Hastings site" for a new school. This block has no bus stops, however, and effects of project loading on MUNI service would be expected to be minor, even if an entrance to the school were eventually located across the street. If the school project were formally proposed for the Hastings site, that project could be subject to separate environmental review, including analysis of traffic and loading impacts. As stated in response to Comment HH-1, above, the school district is not planning to construct the new school on the "Hastings site."

IV. Public Hearing Comments and Responses

HH-10) Please see the response to Comment N-4, p. 132 of this document, regarding effects on project-generated shadow of modifying the top of the proposed New State Office Building. Please see the response to Comment N-5, p. 132 of this document, regarding potential design approaches to reducing project wind effects.

HH-11) Comment noted. The comment expresses a preference for Alternative 2, and no response is necessary.

MR. CULLEN: My name is Kelly Cullen. I live at St. Boniface Church at Golden Gate and Leavenworth, a few blocks down from the State Building.

I too am actually here more than anything else to say that I strongly support Alternative 2. In my discussions with many people, both in the Tenderloin and throughout the city, it is my sense that Alternative 2 is not only better for the state financially, as you have just heard, but there's another impact that has not been calculated, and that is the political impact. If you go with Alternative 1 and you have city-wide groups such as San Francisco Tomorrow, San Francisco Beautiful, and Heritage and others opposing the project, if you have community people opposing the project, projects take longer.

II-1

It's my understanding that the Mayor and the Planning Commission have also addressed some concerns to the state about the need to look at developing both sites.

The community concerns I think are pretty clear. The massing of this building is not something any of us want in our neighborhood, and we don't believe any of you would really want so close to your community or in your community. It isn't a situation where we are saying we don't want this and it's your problem. What we are saying as well is, you have a piece of land right across the street that is already a problem for the community and for Civic Center in terms of its lack of activity and the danger and just other nuisances it attracts. So, this is an opportunity for you to resolve that other issue for the state and come up, as Brad said, with a really great plan.

II-2

There are a couple of goals. On Page 219, it talks about the impacts if no project were built, so I am looking there. It talks about the importance of housing state offices in state-owned buildings. Alternative 2 does that. It does it in two buildings instead of one.

II-3

Ensure long-term savings. Like I think as you're hearing with the phone system, that is going to have to be dealt with, and there are going to be more long-term savings by developing Alternative 2 because you will be able to do it faster, whereas Alternative 1, I haven't heard anybody support, so there could be political log jams on Alternative 1. That is a cost.

II-4

The other cost to the state on doing Alternative 1 rather than Alternative 2 is, after you finish with Alternative 1, it's going to cost more than a million dollars to fix up 525 Golden Gate in '96 or 1997 or 1998 or 1999, or whenever it's going to be resolved. So there are additional costs with going with Alternative 2.

It says you want to reuse the State Office Building in a manner consistent with its historic functions. But everyone keeps talking about the development of this building as if it's hiding the Federal Building. And if this goal is read correctly, it's my understanding that it should be clearly looked at only in terms of how it relates historically to Civic Center. So, if this goal is going to be met, I think Alternative 2 allows more opportunity for that to happen.

II-5

Also, another goal is to ensure the state's real estate value in terms of full use of their assets. Since both private developers and the school district that looked at 525 Golden Gate as a school site -- nobody wants the school site. To be told by staff that we are going sell it down the road, a building that has seismic problems, asbestos problems, that people talking about building an office building on the same side of Golden Gate at Van Ness and Golden Gate don't want to touch 525 Golden Gate. The school district doesn't want it. This is not a very valuable property in its current state.

II-6

Looking at the next paragraph, it talks about responding to the city's concerns. The city's concerns are to enhance governmental activities in Civic Center. If that is going to be met for the State of California to leave a totally vacant state office building across the street is not really completely enhancing the state activities or the governmental activities at Civic Center.

II-7

It also talks about maintaining architectural resources. And really rather than belaboring it, I think many people have spoken quite eloquently about this nice building could be made much better and fit in better with the Civic Center and the state Civic Center building if it were a smaller property.

II-8

Hopefully we can move ahead quickly with Alternative 2. Thank you.

Commenter II - Kelly Cullen

- II-1) Comment noted. The commenter expresses support for Alternative 2, and no response is required. As the commenter notes, many other commenters have also expressed a preference for Alternative 2.
- II-2) Comment noted. The commenter expresses support for Alternative 2, and no response is required.
- II-3) Comment noted. The Draft EIR states, on p. 222, that Alternative 2 would meet several project objectives, including: provide adequate space for the program, meet legislative goals to maintain a strong presence of state offices in San Francisco; consolidate state office space in the Civic Center; maximize the number of offices housed in state-owned buildings; ensure long-term savings that accrue with state ownership; reuse the California State Building in a manner consistent with its historic function; and develop a project with a structural system capable of supporting a long life-span and quick re-occupancy after a major earthquake.
- II-4) Regarding the use of 525 Golden Gate Avenue (Alternative 2) and the existing condition of that building, including financial issues, please see the Supplemental Analysis of Alternative 2, p. 5 of this document.
- II-5) Alternative 2 would develop a New State Office Building of 13 stories, rather than 16 stories, as with the proposed project. At 180 feet, the new building in this alternative would be about 30 feet shorter than the proposed new building; the new building in this alternative would therefore be about 100 feet taller than the California State Building, compared to a new building about 130 feet taller with the project. Please see the response to Comment C-1, p. 50 of this document, regarding the project effects on the historic districts.
- II-6) As stated in the Supplemental Analysis of Alternative 2, p. 5 of this document, the Department of General Services does not believe that the 525 Golden Gate Avenue property is not usable or valuable. Should the building eventually be demolished, the property itself has some inherent positive value, that at least partially offsets the cost of

asbestos removal and demolition. In the mid-term (five-to ten-year) planning period, it is conceivable that this property may be offered for sale.

- II-7) As stated on p. 2 of the Draft EIR, no specific proposal for the 525 Golden Gate Avenue building has been developed, and the EIR does not evaluate the effects of any reuse or disposition of that existing building, as reuse of 525 Golden Gate Avenue is not a project objective. It should be noted that the project alternatives that would include occupancy of 525 Golden Gate Avenue would include the same program of state offices, and would result in no more and no less enhancement of governmental activities in the Civic Center.
- II-8) Comment noted. The comment expresses support for Alternative 2 and does not address the adequacy of the EIR. No response is required.

MR. LEVIN: Apology accepted. [The commenter's speaker card was inadvertently misplaced prior to his being called to the podium to speak.] I am Michael Levin. I am here as an interested individual who has long been interested in the architectural, environmental problems and achievements here in Civic Center.

My main concern is always historic preservation, and I was glad to see the attention paid to what is proposed for the old State Office Building, and I trust it's in very good hands with Mr. Turnbull, the part of the project relating to the restoration of all the important historic elements of that building, including the interior areas, the Supreme Court chamber, including the two very unusual flag poles that were torn down after the earthquake. I certainly will be glad to see those back. I think that was well addressed in the EIR.

JJ-1

I am always impressed with EIRs, no matter whether I agree with everything or not. But I do like to find problems or errors that I can find. I haven't had too much time to look at this one. But when you go to Page 58 and 59 and Figures 25 and 26, one very point. The photomontage is Figure 26. Instead it's labeled as Figure 25, where it says photomontage. Just one little error to correct there for the final EIR.

JJ-2

Speaking of the photomontage, the one depicted in Figure 26, I think that illustrates very well what Ms. Miller was saying about the appearance of the new part -- of the building from Larkin Street, or from Polk Street for that matter, and that large glass area in between. I understand, and I attended a recent meeting of the Landmarks Board, and it was explained to me the nature of that glass enclosed atrium, the importance of getting the light in there. But when you look at that composition, it does look like so many other stark, international style buildings of the Fifties and Sixties. Do we really want to have something that echoes the Federal Building? Don't we want to do something better than that? Isn't it possible, if the cost isn't prohibitive, to have a design for the Larkin and Polk Street facades as well as the Golden Gate Avenue facade -- that huge mass there.

JJ-3

The previous speaker talked about it being just one huge block, and that is what it is. Do we want to cover up the old Federal Building but have something just like it across the street? Can't we do better than that?

Also, relating to the completeness of the EIR, there is a paragraph about the appearance of the facades proposed for the new building on Page 22, but pardon me if I missed this somewhere else, but I don't see any mention of that, what looks like some kind of screen on the Golden Gate Avenue facade, the inter-rectangular area here.

JJ-4

So, I am not sure what that is, and I think that there should be some explanation of exactly what that is in the EIR. So, I apologize if I missed it, but I don't see it here.

I agree with Ms. Miller that there should be -- and others -- that there should be photomontages that show much more clearly and from a closer proximity just what the visual impact of this new building will be, both at the front -- not from the south side of the plaza, but from closer to McAllister Street, see what the impact is, and from the sides and from a diagonal location. I know you can't fill up the EIR with too many illustrations, but something that gives a better idea than these very distance views which don't really do justice to the project it intends to depict.

JJ-5

Finally, I didn't know too much about this before I had a chance to look at the draft EIR. I am very impressed with what some of the previous speakers talked about with relation to the alternatives. No matter how well this massive new building is designed, any alternative that can possibly reduce the mass of this new building should be welcomed. I hope these alternatives aren't in here to fill space and to carry out the requirements of CEQA, as I see in almost every EIR that I have been interested in in the past. I hope that you really consider carefully what is in these alternatives and see if that can't be reduced, see if 525 Golden Gate can't be reused. But for the final EIR, that alternative, particularly Alternative 2 and Alternative 3, should be expanded with pictures. I think it's very important not to go ahead with this unless you're sure that there is just no other way. I understand the space is needed for state offices, but if it doesn't all have to be in that one building, if it can be buildings right across the street, why not go for that.

JJ-6

The new building will be very close to the plaza, as Ms. Miller brought out. All the models and pictures, photomontages aren't going to give you the impact of the real thing. When you see that looming over the Old State Building just north of the plaza, that is a lot closer than the Federal Building.

JJ-7

So, good luck with this, but I hope you will reconsider everything we have talked about. Thank you.

Commenter JJ - Michael Levin

- JJ-1) Comment noted. No response is required.
- JJ-2) The commenter is correct. Please see Chapter II, Revisions to the Draft EIR for revisions to pp. 58 and 59 of the Draft EIR text, to correct the titles of Figures 25 and 26, which were reversed in the Draft EIR.
- JJ-3) Comment noted. The comment addresses the project design, and not the adequacy of the EIR. No response is required. For information, it is noted that the glass-enclosed atria that would form the portion of the building to which the comment makes reference are intended to bring natural light into the building interior, with work spaces no more than 30 feet from natural daylight, as stated on p. 24 of the Draft EIR. Please see also the response to Comment F-2, p. 72 of this document, for additional discussion regarding the Golden Gate Avenue facade.
- JJ-4) The design feature of the proposed New State Office Building's Golden Gate Avenue that is noted by the commenter is described in Section III.B, Visual and Design Features, on p. 53, which states, "Between the 3rd and 14th floor, and about 30 ft. in from Larkin and Polk Streets, the north facade would be extended out about two ft. beyond the property line, with a pattern of larger window openings." This feature is shown in Figure 4, p. 10 of the Draft EIR.
- JJ-5) Please see the response to Comment GG-3, p. 169 of this document, regarding visual simulations.
- JJ-6) Please see pp. 29-33 in Chapter II of this document for visual simulations of Alternative 2. Regarding the use of 525 Golden Gate Avenue (Alternative 2), please see the Supplemental Analysis of Alternative 2, p. 5 of this document. The commenter's support for Alternative 2 is noted.
- JJ-7) Comment noted. The comment addresses the project design, and not the adequacy of the EIR. No response is required.

MS. BERGER: My name is Kathy Berger, and I am executive director of North of Market Planning Coalition. I have been in this position since February of 1994. North of Market Planning Coalition has been in business for 15 years.

I would like to speak to the EIR and to the unanimous decision of the board of directors of North of Market Planning Coalition, which is a 21-person board, to why we believe that the EIR is inaccurate at this point.

KK-1

But before I do so, I would just like to tell you something very briefly about North of Market Planning Coalition. North of Market is a planner and a convener and an advocate for residents and businesses in the Tenderloin. Its purpose is to coordinate neighbors, coordinate businesses, and friends of the Tenderloin together in a planning process to upgrade the quality of life in the Tenderloin.

About two years ago, North of Market Planning Coalition presented a planning document, Tenderloin 2000. The Planning Commission approved that planning document in October of 1993. This is the visionary blueprint for the people of the Tenderloin. Over 2,400 people participated in this process. So, the board of directors of North of Market Planning Coalition represent the interests of the Tenderloin and represents their thoughts and represents their dreams.

This is all important because this is what my job is about. While I am not an architect, I am a community development professional, and what I do is I take the collective vision of the board of directors and I try to articulate that vision. Their vision clearly, from TL 2000 and from community meetings and meetings that we have had with the design team on the building, is that the community does not want a building that is 16 stories high in four elements that continue to go down.

The community, vis-a-vis the board of directors, wants to see Alternative 2 in place. The board has written a letter to you, which I will pass out. I just briefly want to reiterate what some of the other speakers stated.

What North of Market Planning Coalition is concerned about is the bulk, the mass of this building. North of Market feels it will be a negative impact, the shadows and the wind. There are some shadows that extend down to Leavenworth Street because of the bulk of the building.

KK-1

The North of Market Planning Coalition also looked at the height of the building and also looked at public safety elements and found that the way the building is designed, it's not reflective of the special needs of the Tenderloin community.

One thing we are very, very proud of in the Tenderloin is the Civic Center, which technically is also part of the Tenderloin, and that this does not blend in with the Civic Center design.

When you're a low-income community, sometimes it is very difficult for people to take you seriously and to honor your point of view. I ask you today to honor the point of view of the Tenderloin community, the people who have spoken to you regarding Alternative 2, and to seriously take a look at Alternative 2.

Commenter KK - Kathy Berger, Executive Director, North of Market Planning Coalition

KK-1) The commenter states that the Draft EIR is inaccurate, but indicates no specific inaccuracies or errors. Therefore, no response is possible regarding this contention.

The commenter expresses support for Alternative 2, and no response is required. Regarding the use of 525 Golden Gate Avenue (Alternative 2), please see the Supplemental Analysis of Alternative 2, p. 5 of this document.

Regarding shadow effects, Figure 30, p. 69 of the Draft EIR, indicates that project shadow could reach Leavenworth Street. This figure illustrates shadow that would be cast by the proposed New State Office Building if there were no other buildings present, as is stated on p. 68. However, when project shadows were long enough to reach Leavenworth Street, much of the area that would otherwise be shaded by the New State Office Building is already shaded by existing buildings. Shadow impacts are described in the Draft EIR on pp. 62-70. No significant effects were identified. Please see also the responses to Comments F-9, G-5, L-1, N-4, and DD-4.

Project wind effects are described in the Draft EIR on pp. 74-78. With the project, the wind environment would be about the same, or improved overall, compared to existing conditions, and no significant adverse impacts were identified. Please see also the responses to Comments G-6, L-2, and N-5.

Regarding public safety, please see the response to Comment M-3, p. 118 of this document, regarding building lighting.

The commenter also raises a planning issue regarding the Tenderloin 2000 report. This comment does not address the adequacy of the Draft EIR, and no response is required. The following is provided for information. The San Francisco Planning Department's Draft *Civic Center Study*, released for public review in October 1994 and cited as (in its then-administrative draft stage) in the Draft EIR on p. 36, excerpts goals and objectives from the Tenderloin 2000 report and includes those goals and objectives in the North of Market component of the *Civic Center Study*. The Draft *Civic Center Study*, on p. 166, states that the City Planning Commission, by resolution, "acknowledged and

commended the [North of Market Planning] Coalition for preparing their (sic) report which could be the basis for an area plan for the North of Market Neighborhood."

Regarding the relationship of the Tenderloin to the Civic Center, the Planning Department's Draft *Civic Center Study*, identifies the Civic Center and North of Market/Tenderloin as distinct subareas within the "Civic Center and its environs."

V. APPENDIX

Memorandum

Date : March 6, 1995

File No.:

To : Cheryl Widell
State Historic Preservation Office
Department of Parks and Recreation
P.O. Box 942896 A-50
Sacramento, CA 94296-0001

From : Department of General Services—Office of Project Development and Management

Subject: **SAN FRANCISCO STATE OFFICE BUILDING COMPLEX**

Thank you for your comments on the Draft Environmental Impact Report for the State of California San Francisco Civic Center Complex. Your letter stated that "the Draft EIR does not present substantial evidence in the record to support its conclusion that the height and massing of the new building does not cause a significant environmental impact on the historic California State Office Building and the character and setting of the Civic Center National Landmark District". In light of your concern, we are responding at this time, prior to the publication of the Final EIR, to further explain our determination that the project's visual impacts are not significant.

A significant impact is defined by the California Environmental Quality Act Guidelines as a substantial adverse change in the physical environment. The project's visual impacts on cultural resources are a combination of both site-specific and district-wide factors. Thus, the Department determined that the beneficial district-wide impacts from the New Building outweighed any potentially adverse site specific impacts. This approach is consistent with previous SHPO recommendations that the Department seek a cumulative balance of project effects from rehabilitation of the California State Building. The Department also based its analysis of impacts on the existing setting, which includes the presence of buildings both within and outside the Historic District.

Effect of New Building on the Historic District

The principal distinguishing feature of the District is the composition of Beaux Arts structures centered around City Hall. The National Register Historic District nomination form states:

Within the scope of turn of the century classical architecture in the United States, the San Francisco Civic Center contains several fine examples of the mode and one superlative example in the City Hall. The other buildings in the group, however, although less interesting in themselves, cannot be judged in the same way. In particular the [California] State Building, the [Old] Federal Building [on United Nations Plaza], the [Department of Public] Health Building [at Polk and Grove Streets] and the War Memorial Group would probably appear rather dull in themselves, as if they were missing an essential ingredient. But seen in the context of the Civic Center as a whole, and in relation to City Hall, all the buildings together achieve distinction.

The criteria on which the buildings are judged, then, must be the degree to which each enhances the group without distracting from the City Hall. These qualities are achieved

through a harmony of color, material, scale, size, texture, rhythm, and style. Within these constrictions the buildings achieve individual interest through the imaginative manipulation of the elements. These are the criteria on which the architects of the buildings would have wanted them to be judged.

In providing direction to the design-build teams, the Department recognized the importance of the California State Building: "The visual and symbolic importance of the project cannot be over emphasized. The New Annex, which will replace the State Office Building, will be considerably greater in both height and mass than the existing building. As a result, there is strong sentiment that the new building should be supportive and should not assume a position of prominence that will diminish the visual and hierarchical importance of City Hall as the focal point of the Civic Center."

The New State Office Building does not compete with the City Hall. Figure 22 on page 55 of the Draft EIR provides the most conservative angle from which to judge the City Hall's and New State Office Building's relative importance to the District. This view demonstrates that the City Hall, with its centerpiece 300-foot dome, remains the major visual landmark in the Civic Center.

Further, the New Building mitigates the dominance of the federal building on the northern edge of the District. The Department's experience with the California Environmental Quality Act underscores our obligation to deal with the physical environment as we find it. Thus, SHPO's comment that: "The fact that an intrusive element already exists in close proximity to the historic district does not lessen the impact of introducing another disproportionate element...." is legally incorrect. The Department cannot exclude the existence of the Federal Building from our analysis of impacts to the Historic District. The design of the New State Office Building has a mass/void ratio, building materials, and texture that is similar to historic buildings in the Civic Center. With its lighter coloring, the New State Office Building serves as an understated backdrop to the California State Building, and masks the darker shading of the Federal Building, which does, by its style and color contrasts, compete with the City Hall. (Again, we refer to Figure 22 in the Draft EIR.)

Effect of the New Building on the California State Building

While the California State Building is listed as a contributor to the National Register and National Landmark Historic Districts, the Department recognizes that the SHPO has determined it to be eligible for nomination to the National Register as an individual building. Giving due consideration to this determination, the Department viewed the New Building in its more immediate context adjacent to the California State Building.

The New State Office Building is reflective of both the composition of the Civic Center, and the California State Building itself. Viewed from the Civic Center, the New Building mirrors the proportions of the Civic Center itself, funneling down the building size as it approaches the California State Building. A viewer can also see this transition from more to less open space in the central axis of the Civic Center as the plaza approaches Market Street.

The New Building is also deferential toward the California State Building. Its vertical layering serves to break up the mass and scale it down into a composition that is harmonious and contains elements which relate well to the California State Building. The component closest to the California State Building [which is 11 floors high, not 13 floors, as described in your letter], provides an ABAB rhythm in its mass-void ratio, and a cornice line, both of which are reflective of the Beaux Arts style. As it gains height in the second vertical component, it takes on a gentle curve that makes the New Building seem to recede from the older one - allowing the California State Building to remain as the foreground building of the composition. To keep the New Building as a "background" element and prevent it from overwhelming the California State Building, the south facade becomes increasingly simple as it increases in height.

The design architect for the New Building has further explained the new building's compatibility with the California State Building and the Civic Center: "Viewed from the Civic Center, the building reaches its full height only as it approaches the adjoining urban district. Stepping back and up from the historic building, the New Annex appears to recede from it without losing the formality and civic presence that its location requires. It also achieves a scale that is consistent with the Civic Center, despite the overall size of the building. The landscaping of the building - its street trees, plantings, and gardens - also reinforce its strong connection to the features and plan of the historic district." (HSH Design Proposal Submittal)

Compatibility with the Civic Center Plan

The Department disagrees with the SHPO's interpretation of the Draft Civic Center Study (October 1994). In discussions with the City, the Department understood that the City very much wanted the New Building to mask views of the Federal Building. The Department therefore made the buffering and transition from the Federal Building an objective of the project. Further, a complete reading of the Architecture and Urban Design Objective 2, Policy 2 of the City's Civic Center Plan shows that the first tier of buildings surrounding the Civic Center would continue to remain at 80 feet. This is the historic tier consisting of the Old Main Library, the Civic Auditorium, the Public Health Building, and new City buildings, such as the New Main Library and the City Courts Building. The City recognized the need for transition between the historic District and the surrounding area.

Consistency of the New Building with the Secretary of Interior Standards

The Department incorporated the Secretary of Interior Standards for Rehabilitation into the project's design. The Guidelines for those Standards include three recommendations for Alterations/Additions for the New Use. The following paragraphs describe each recommendation and how each recommendation influenced the project's design.

1. "Designing required new parking so that it is as unobtrusive as possible, i.e., on side streets or at the rear of buildings. 'Shared' parking should also be planned so that several business[es] can utilize one parking area as opposed to introducing random multiple lots."

The parking in the project is underground, and cannot be seen on the facade of the old or the new building.

2. "Designing and constructing new additions to historic buildings when required by the new use. New work should be compatible with the historic character of the district or neighborhood in terms of size, scale, design, material, color and texture."

We have demonstrated above how the New Building would be compatible with both the National Landmark Historic District and the California State Building. The New Building reflects, but does not mimic the Beaux Arts style, and uses similar materials, colors and textures. The use of vertical components brings the New Building into scale with the California State Building. The size of the New Building at the rear of the property is necessary for the program. It also serves to mask the view of the far less compatible Federal Building.

3. "Removing nonsignificant buildings, additions, or streetscape and landscape features which detracts from the historic character of the district or the neighborhood."

The project removes the existing nonsignificant State Building at 455 Golden Gate, which is not compatible in design with the California State Building. The project also removes the Federal Building from Civic Center views to the north. The Federal Building's darker color and more modern style are incompatible with the Historic District.

We reiterate that, similar to the rehabilitation work within the California State Building itself, the New Building design must be evaluated in the context of the site, the district, and the region. Considered on this basis, the Department strongly believes that the project, including both the rehabilitation of the California State Building and the construction of the New State Building, will over time be an asset to the Historic District, in much the same way the design of the Louise M. Davies Symphony Hall and the Public Utilities Commission Building have been received. The New Building is deferential to City Hall, the primary center of the District. The Building is also deferential to the California State Building. The New Building keeps the California State Building as the foreground building of the composition, and maintains the architectural integrity that its setting requires. Finally, the New Building transitions between the historic Civic Center and the more standard urban design to the north.

Although we believe that your letter of December 19, 1994 did not characterize the new building's visual impacts as significant, we would appreciate hearing from you as to whether or not our further analysis satisfies your request for additional evidence. Before we prepare the Final EIR, with its responses to comments, we want to be certain that we have correctly understood your position. It is our present intent to characterize the project's visual impact as insignificant, taking into account site specific, district-wide, and regional factors. Unless we receive comment from the SHPO to the contrary, the Department will assume the SHPO is satisfied with the foregoing explanation.

Margaret K. Hudson

Margaret K. Hudson, Chief

cc: Kevin Kaestner, OPDM
Mike Courtney, OPDM
Christal Waters, OPDM
Karl Heisler, ESA



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March 17, 1995

Margaret Hudson, Chief
Office of project Development and Management
Department of General Services
400 R. St.
Sacramento CA 94814

RE: State of California San Francisco Civic Center Complex

Dear Ms. Hudson:

Thank you for your letter of March 6, 1995, which provides substantial evidence to support the General Services Department's conclusion that the height and massing of the new building at 455 Golden Gate does not cause a significant environmental impact to the historic California State Office Building or to the character and setting of the Civic Center National Historic Landmark District. I appreciate the opportunity to review this material prior to the publication of the final EIR.

Sincerely,

Cheryl Widdell
State Historic Preservation Officer

